
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 42/2025**

Precautionary Measure No. 250-09

José Alejandro Solalinde Guerra and Members of the “Hermanos en el Camino”
Migrant Shelter of Ixtepec regarding Mexico¹

May 12, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of José Alejandro Solalinde Guerra and members of the “Hermanos en el Camino” Migrant Shelter in Ixtepec, Oaxaca, Mexico. At the time of making the decision, the Commission assessed the actions taken by the State during their implementation. It was also noted that, regarding the main beneficiary, no information has been available that would support the identification of a situation presenting an imminent risk under Article 25 of its Rules of Procedure, since 2017. Consequently, the IACHR decided to lift the measures.

II. BACKGROUND INFORMATION

2. On April 23, 2010, the IACHR granted precautionary measures in favor of José Alejandro Solalinde Guerra (“Father,” “Priest,” or “Mr. Solalinde”), David Álvarez Vargas, Areli Palomo Contreras, Mario Calderón López, and Norma Araceli Doblado Abrego, who worked or were staying at the “Hermanos en el Camino” Migrant Shelter, in the municipality of Ixtepec, state of Oaxaca, Mexico. According to the information received, the beneficiaries were reportedly subjected to acts of intimidation. Notably, in February 2010, Father Solalinde Guerra had been allegedly detained and held at gunpoint by federal police while visiting the Oaxaca State Prosecutor’s Office in connection with investigations into the suspected murder of three migrants. It was indicated that the protection measures implemented by the authorities were ineffective, and that the acts of harassment continued. The Inter-American Commission required the following from the State of Mexico:

- a. to adopt the necessary measures to guarantee the life and personal integrity of José Alejandro Solalinde Guerra, David Álvarez Vargas, Areli Palomo Contreras, Mario Calderón López, and Norma Araceli Doblado Abrego;
- b. that the planning and implementation of protection measures be carried out in agreement with the beneficiaries and their representatives; and
- c. to report on the measures taken to eliminate factors that place the beneficiaries at risk.²

3. “Scalabrinianas Misión con Migrantes y Refugiados” (SMR) and “Dimensión Pastoral de la Movilidad Humana” (DPHM) of the Conference of the Mexican Episcopate exert representation before the Commission.

III. INFORMATION PROVIDED DURING THE TIME THESE PRECAUTIONARY MEASURES WERE IN FORCE

¹ In accordance with Article 17(2)(a) of the IACHR Rules of Procedure, Commissioner José Luis Caballero Ochoa, a Mexican national, did not participate in the debate and deliberation of this matter.

² IACHR, Annual Report 2010, [Precautionary Measure No. 250-09](#), José Alejandro Solalinde Guerra and Members of the Migrant Shelter, Mexico, April 23, 2010 (Available only in Spanish).

A. Procedure during the time the measures were in force

4. During the time the precautionary measures were in force, the Commission followed up on the situation by requesting information from the parties. In this regard, communications were received from the parties and sent from the IACHR on the following dates:

Year	State	Representation	IACHR
2010	May 26, November 19	June 28, October 6, December 27	June 15, October 29
2011	February 3, August 9, October 11, November 17	March 3, May 12, August 3, August 12, December 15	January 13, July 19, August 8, October 20, December 5, December 30
2012	June 12 and 13, November 10	April 17, 23, and 29; July 24 and 25; December 17	April 23 and 26, May 10, June 18, September 8 and 26, November 27, December 21
2013	February 12, July 19	May 6	March 14, May 21, October 21
2017	May 2	March 30 and 31; April 7 and 22; May 25; June 16 and 30; October 11	March 31, October 11 and 15
2020	August 25	No information	August 4, December 22
2022	No information	May 9	April 20
2023	November 8	August 17	August 7
2024	No information	No information	January 3 and July 19

5. On May 22, 2012, the IACHR issued Press Release 54/12, condemning the threats against Father Alejandro Solalinde.³ The Commission has not received an update from the representation since 2017, despite requests for information and reiterations. On May 2, 2022, the representation reported a change in contact details, with no update or observations. On August 7, 2023, both parties were requested to provide information in order to assess keeping the precautionary measures in force. The representation responded on August 17, 2023, stating that they had not maintained communication with Father Alejandro Solalinde Guerra and therefore had no information regarding any current risk against him or his current situation.

B. Information provided by the State

6. During 2010, the State reported that on January 25, 2010, the Ministry of the Interior (SEGOB) was informed of the situation regarding Priest Alejandro Solalinde, Director of the Migrant Shelter “Hermanos en el Camino” (“the shelter”). They requested the adoption of protection measures: the Ministry of Public Safety and Security of the State of Oaxaca (SSPE) requested the State Police to guarantee the beneficiary’s safety; and the Office of the State Attorney General (PGJE) indicated that no complaints had been filed. There were concertation meetings on January 26, March 18, and May 14, 2010. In these meetings, the issues of public lighting, video cameras, and cyclone mesh in streets surrounding the shelter were addressed; a mobile satellite phone was requested; a cell phone with pre-paid credit was provided; emergency numbers of SSPE and PGJE authorities were shared. The State also proposed to issue public statements recognizing the defense work of Father Solalinde and to continue training police personnel in human rights and updated on the status of investigations into the facts of the matter. To elaborate on the last element, a new meeting was held on April 9 with the PGJE and another one was set for April 20 with the Office of the Attorney General (PGR). In November, it was added that the projects concerning the solar system powered street lighting and the cyclone mesh were 90% complete; the delivery of the closed circuit was scheduled for November 30, 2010; on July 21, 2010 a statement was published by SEGOB recognizing the work of the beneficiaries as human rights defenders of migrants, but it was clarified that the SSPE did not have the authority to issue a statement in those terms;

³ IACHR, Press Release 054/2012, [IACHR Condemns Threats against Father Alejandro Solalinde in Mexico](#), May 22, 2012.

federal police officers were trained in March 2010 by the National Human Rights Commission (CNDH), and the National Migration Institute (INM) offered other trainings for migration agents “during 2010.” They also participated in three courses for the federal police in June, August, and November 2010; and training was also provided for state police personnel. In addition, observations were made on draft legislation and administrative changes regarding migration, on what is considered “human trafficking” and the defense of migrants, on the protection of migrants by the authorities, on an investigation of human and drug trafficking networks in the region, as well as on the operation of bars around the shelter and a request to create a special prosecutor’s office for the care of migrants. Lastly, the State reported the detention of individuals transporting children to the United States, who stated that they had stayed at “Father Solalinde’s shelter.” It was clarified that no accusation was made against him or any other human rights defender and, although Father Solalinde appeared before the Public Prosecutor’s Office on July 13, 2010, his statement was not accepted because he was not a defendant.

7. In its 2011 reports, Mexico indicated that measures consisting of street lighting and perimeter fencing were implemented and, on December 16, 2010, the closed circuit video recording camera system was delivered, and others were budgeted. Further information regarding reinforcement of security with six police officers to patrol the surrounding area of the shelter, as well as two permanent police officers stationed at the shelter, was included. In connection with a migrant caravan scheduled for January 7 and 8, 2011, in which Father Solalinde was set to participate, security measures were made available to him, and security agencies were instructed to ‘take the necessary precautions.’ Additionally, SSPE emergency contact numbers were provided. On that occasion, the government of Oaxaca appointed four police officers to protect Mr. Solalinde. Furthermore, the Governor of Oaxaca held a public event in April 2011 to highlight the work carried out by Father Solalinde and members of the DPMH; and that they continued to train police officers on the human rights of migrants. By the end of 2011, the following security measures were in force: i) three SSPE officers assigned to accompany Father Solalinde and one stationed at the shelter, along with communication radios; ii) regular patrols of the shelter by state police; iii) installation of street lighting, surveillance cameras, and perimeter fencing with barbed wire; iv) emergency telephone access to authorities at all three levels of government; and v) a mobile phone provided to the Priest with monthly prepaid credit. At the Father’s request, there was a commitment to modify the security detail to two police officers accompanying him and two stationed at the shelter, and that the federal police would report monthly on the surveillance patrols. On September 30, 2011, the parties held a concertation meeting. During this meeting, the members of the shelter were updated, it was agreed to review the lighting on the train tracks, training issues were addressed for state security elements and the special prosecutor’s office, and it was established that the PGJE would hold a meeting to review progress in investigations.

8. In 2012, the State updated that, on May 14, 2012, Alejandro Solalinde announced his decision to leave the country due to threats against him, which coincided with a work tour in the United States, Canada, and Europe. On April 20, 2012, an investigation was opened for threats against the beneficiary. On April 27, the SSPE increased security with more patrols and police presence, and on April 30, four police officers with a firearm and radio were appointed to provide security for the Priest and the shelter. Regarding the threats made by the “Grupo de Rescate Urbano” (Urban Rescue Group, GRU) against Father Solalinde in April 2012, security was reinforced, and security and surveillance patrols were implemented outside the shelter. At a concertation meeting held on April 30, 2012, it was agreed to deploy four state police officers to the shelter and assign four PGJE agents for the protection of Father Solalinde. Additionally, the state police were to reinforce municipal patrol efforts by increasing the number of daily patrols. By 2012, twelve CCTV cameras were operating at the shelter. On July 11, August 20, and October 8, 2012, the Governor of Oaxaca received the representation. The SSPE was in charge of Father Solalinde’s security detail until April 4, 2012 and, as of that date, it was transferred to the PGR. Moreover, they were provided a van.

9. During 2013, a new risk assessment was carried out and three cameras were repaired. Regarding investigations of threats against Father Solalinde in April 2012, the source of the death threats could not be identified. In addition, the PGJE did not find that there was evidence of the extremes of abuse of authority in relation to some reported facts, but an arrest warrant was executed against an official for abuse of authority

against Father Solalinde because of other facts. Cleaning and renovations were carried out at the shelter. In connection with an incident against Father Solalinde on March 26, 2013, facilities were granted so to file a complaint for illegal detentions of migrants between January and February 2013. In addition, two vehicles were made available to the representation to replace the one being used by Father Solalinde and his security agents.

10. In its 2017 reports, the State noted that on March 27, 2017, they contacted the representation regarding threats made against Father Solalinde on social media between March 24 and 26. As a result, a concertation meeting was held on April 3, 2017. The replacement of the vehicle was discussed on March 3, 2017 and, at the request of the representation, they were provided a newer vehicle on March 30. On April 24, 2017, a new follow-up meeting was held to review the monthly fuel budget, plans for the upcoming restoration of the perimeter fence, and installation of solar lighting at the shelter. During the meeting, it was also reported that the state police had delivered security materials, including ballistic equipment, and replaced one officer, with two additional officers to be assigned upon their graduation from the police academy. The Prosecutor's Office also provided a report on the progress of the investigations. At that time, Father Solalinde was in Veracruz, therefore, at the request of the representation, security was provided by the federal police.

11. In 2020, the State reported that a risk assessment was conducted for Priest Solalinde on April 19, 2019, which concluded that he was facing an extraordinary level of risk. It was decided to continue with the following measures: video surveillance cameras and closed-circuit TV at the lodge; motion sensor reflectors; SUV with GPS; fuel supply, and electronic tolls. Regarding the vehicle, the government of Oaxaca provided a 2010-model vehicle. However, following an incident on July 30, 2017 during which Mr. Alberto Donis died, the vehicle was replaced by a 2018-model pickup truck on August 1, 2017. By then, four state police and one patrol car were available to protect the shelter; the perimeter fence and solar lamps were maintained at the shelter; state police were assigned to coordinate patrols at the shelter; and it was reported that in April 2017, a requirements assessment had been conducted, and maintenance was provided to the lighting fixtures. They added that, following an earthquake in September 2017 that resulted in damage at the shelter, its restoration was arranged and concluded in December 2017. It was also reported that in July 2018, a 'mini split' air conditioner had been installed to regulate the temperature in the room housing the closed-circuit camera equipment, and the government was designated to cover the cost of electricity. Regarding the stage of the investigations, it was emphasized that a file had been opened for the crimes of homicide, assault, and damage in connection with a traffic accident that resulted in the death of defender Alberto Donis and that the process was before the court. Regarding the meetings held, seven were held in 2019: February 13 and 26, May 30, June 5, September 2, November 4, and December 9. A worktable took place on February 25, 2020, and contact was maintained with the representation.

12. Its last report from 2023, the State detailed the measures in place were as follows: the closed-circuit television; 22 surveillance cameras with channeling; one cellular telephone equipment with location application for immediate reaction systems; one SUV vehicle with GPS type 4x4; the fuel supply; the electronic toll service; and four motion sensor lighting reflectors. In October 2023, the service provider company carried out a service visit. Mexico added that that in July 2021, the vehicle had been swapped for a brand-new 2021 model. The State added that the payment of electricity for the shelter was covered and improvements, restoration and equipment, interior and exterior cleaning, masonry and blacksmith work, storage rooms for firewood and vegetables, and remodeling of the dining room and dormitories had been carried out. At Father Solalinde's request, a permanent presence of the Migrant Prosecutor's Office was established in Ixtepec, Oaxaca, to monitor the migrant route. Since its establishment, there had been no incidents reported against Father Solalinde or members of the "Hermanos en el Camino" shelter. In addition, the government of Oaxaca and the Office of the United Nations High Commissioner for Human Rights (OHCHR) conducted training and awareness-raising on the human rights of migrants for public servants in Oaxaca, including state and municipal police.

C. Information provided by the representation

13. During 2010, the representation indicated that they had five meetings with authorities. A statement recognizing Father Solalinde's work as a human rights defender was accepted, but it was not supported by the government of Oaxaca. They requested a joint document from the SSPF and SSPE that acknowledged the humanitarian efforts of the beneficiary. Additionally, they requested to be involved in shaping the content for human rights training for police officers at all three levels of government. It was confirmed that the measures related to the cyclone mesh, emergency lighting, public lighting, and the closed-circuit system are in progress. The installation of the emergency lighting was considered urgent. A cell phone was approved instead of a satellite phone, and it was expressed that the SSPF emergency cell phone had not been issued to them. Related requests were made on several topics regarding the migrant route in the country.

14. In their 2011 communications, they highlighted the publication of a statement regarding Father Solalinde's work as an advocate and that the new government of Oaxaca recognizes his work. It was expressed that the municipal and state police should continue to be trained. Moreover, the installation of a cyclonic mesh, solar lights, closed circuit system, and the delivery of the cell phone with pre-paid credit were confirmed. It was reported that the CNDH issued its "Recommendation 23", due to the "attempted criminalization carried out by Mr. [O. H. M.], former Regional Delegate in Oaxaca of the INM, against Father Solalinde and other members of the DPMH". In turn, at the concertation meeting of May 6, 2011, the list of people working at the shelter was updated. Furthermore, during a large-scale event with migrants on July 31, 2011, it was reported that a convoy of about 30 patrol cars from the municipal and ministerial police arrived, armed with long guns and wearing hoods. They surrounded Father Solalinde's vehicle and detained a guard who was stationed outside. Despite presenting a signed document from the Commissioner of the State Police of Oaxaca, which authorized the guards and listed the number and types of weapons they were carrying, the legality of the guards was dismissed, and they were taken into custody. Afterwards, they were given "an apology, but surely the official document was misplaced." A threatening, arrogant attitude, and excessive use of force by the police officers were alleged. The need to issue a new statement on human rights defenders of migrants was also mentioned, due to recent statements by high-ranking officials that "criminal groups use the banner of human rights to tarnish the good name of institutions." Necessary improvements to the cyclone mesh, lights, and the closed-circuit system were noted.

15. In its observations from 2012, reference was made to the discovery of the body of a teenage girl next to the train tracks on March 31, 2012. In this context, "private railroad policemen" from the Urban Rescue Group made stigmatizing remarks, including an invitation to provide them with "poisoned food." The Father went to the teenager's wake, where there were people from the GRU who attempted to attack him. The individual was removed but waited outside to attack him again. The Father was escorted to safety by his security agents. The representation reported that the following day they were informed that some individuals "had already hired a hit man" to assassinate Father Solalinde. On April 15, 2012, while Mr. Solalinde was welcoming a group of migrants, two individuals from the GRU barged in and began to assault the migrants and Father Solalinde. They pointed their index fingers at him and shouted *pinche pollero* [Derogatory term, "pollero" refers to a person who facilitates illegal migration]. They referred that when the Father questioned them, it angered them and prompted them to shout that they would return with more people and that they were going to kill Father Solalinde. According to the representation, a third individual arrived, intervened in his defense, and removed them from the situation. On April 19, 2012, a former governor of Oaxaca said that "I don't know Father Alejandro Solalinde, God will punish him for being a liar." It was also reported that on April 20, an individual had told Alejandro Solalinde that a guest at the hotel where he worked stated that "he had received money to kill Father Alejandro Solalinde"; and that this event was reported to the Public Prosecutor's Office. On April 29, 2012, authorities were requested to support the protective transfers in favor of Father Solalinde between various locations on April 30, May 4, and April 11 and 12, 2012. The representation indicated that the authorities were notified of Father Solalinde's temporary departure from the country, while they required the reinforcement of the shelter's security. In turn, three weeks prior to his departure and three weeks after his return from the country, the priest was sheltered in a safe location and added that the SEGOB provided him with security for his transfers and the Federal Investigation Agency provided him with direct protection. It was added that, upon Father's return, two federal police officers in charge of protecting him stole his personal computer from his suitcase in his room, despite the twelve security cameras and four state police officers at the

scene. It was mentioned that between July 5 and 12, 2012, they resumed activities for Father Solalinde's return: they spoke with the PGR about the attempt to hire people in a prison to assassinate the Father; they requested that the SEGOB reinforce pending measures in the shelter and to fix cameras, lighting, and vegetation; and they met with the Governor of Oaxaca to discuss the migration phenomenon in the state. In July, it was reported that a radio program that stigmatized the Father's work. In December, it was confirmed that meetings were held with the Governor, and it was stressed that Mr. Solalinde received protection and accompaniment, and that he had a cell phone and a van.

16. In 2013, it was reported that on March 26, Father Solalinde was receiving a group of migrants who were disembarking from the train when a white, double-cabin pickup truck, with six people onboard, parked a few meters away. The make and license plates could not be identified. Five men got out and headed towards Father Solalinde, while another vehicle approached them. The beneficiary's security agents put him in his vehicle and urgently transferred him to the shelter, where they had greater security. Additionally, it was reported that "neighborhood security committees" were formed in various neighborhoods, equipped with machetes, sticks, stones, and communication radios. These committees detained and assaulted migrants on January 27 and 30, as well as February 14, 2013, for appearing "suspicious," prompting police intervention. In addition, these individuals stated that Father Solalinde was responsible and demanded the closure of the shelter. The representation recognized the protective structure provided to the shelter and to Father Solalinde, while requesting the replacement of the twelve cameras and the vehicle assigned to Father Solalinde. Impunity was also alleged in relation to the complaints filed.

17. In 2017, the representation updated the information on events against the beneficiary. In 2016, a pickup truck blocked Father Solalinde's path and two armed men got out; the bodyguards threw the Father to the ground and, although another vehicle tried to intercept them, they managed to escape. In October 2016, in Mérida, Yucatán, Father Solalinde was concluding a presentation when one of his bodyguards requested that they leave the venue after noticing suspicious behavior. While they were leaving for another activity, the PGR escorts noticed that they were being followed and, after performing dissuasive maneuvers, they corroborated that it was not a false alarm and got out of the vehicle with weapons in hand. The vehicle that was following them fled. It was added that the Father received death threats through social networks. It was reported that before the new governor took office, the vehicle assigned for his protection was withdrawn without prior notice. As a result, the federal government intervened. It was added that they had to wait until March 2017 for a meeting with the state government. It was reported that the maintenance of the shelter, the vehicle, and fuel supply were not followed up. It was reported that at 10:08 p.m. on March 26, 2017, a Tweet with death threats against the Father was published.⁴ The same account responded with new threats to a tweet from the media outlet "La Silla Rota".⁵ It was stated that the Father received various messages in a violent tone and with obscene language. It was added that, in a concertation meeting held on April 3, 2017, it was agreed to change the vehicle for an armored one; to send letters to local governments and federal agencies to notify the beneficiary's activities; to request a new risk assessment; to convene a meeting with the government of Veracruz; to repair the damaged cameras; and to increase the supply of fuel. It was verified that, since April 1, 2017, the vehicle was changed for one of better conditions, and that the CNDH received them to manage accompaniment and support before authorities. On April 5, 2017, a Twitter account replied to the beneficiary as follows, "Father, these are not threats, they are sentences that will eventually be served, remember the migrant children you usurped," with a photograph of a firearm and two cases with 50 bullets each. On April 10, 2017, they had a follow-up meeting, where they highlighted that they did not accept the vehicle offered because it was in poor condition and that a new one would be provided. They insisted on the repair of the protective mesh and perimeter lighting, and requested a review of the security measures along with an increase in security personnel. On April 11, 2017, there was a meeting with federal, state, and municipal security institutions and

⁴ In a 20-second video showing a cardboard sign with Father Solalinde's name, two rosaries, and seven bullets, a distorted voice can be heard saying, "Father Solalinde, stop talking nonsense, you have trafficked the bodies of many migrant children, we ask you to shut your mouth, or we will take the lives you know we can take, you bastard. Best regards." The body of the tweet read "Father. You will die."

⁵ It was stated that, in the tweet, Father Solalinde denounced the Catholic Church's complicity with governments regarding mass graves found in Veracruz, to which they attached the aforementioned video along with the message: "Father has been found guilty of treason. Sentence: death."

the PGJE. The representation recognized the response from the SEGOB as “optimal and exemplary” and withdrew the rush for repairs. On April 24, 2017, there was a new meeting that confirmed the reception of the vehicle and fuel supply, as well as the security material and equipment for the police officers. The incorporation of two police officers and the results of the last risk assessment were pending.

18. In June 2017, information on new events was provided. On April 26, 2017, in Veracruz, the security team spotted a suspicious individual carrying a small backpack similar to the ones used for weapons. The individual claimed that he was a journalist, but the journalists did not know him and when he approached, a security barricade was created to prevent a possible act of aggression. On April 27, while traveling along the highway in Veracruz, the security agents were lost for a part of the journey. During this time, another vehicle with tinted windows pulled alongside for a moment. They then noticed the driver and an individual in the passenger seat, who pointed their fingers at Father Solalinde’s vehicle. On June 29, 2017 a car accident in which defender Alberto Donis died was reported. In this regard, in a concertation meeting of June 30, 2017, the representation warned that the measures contemplated not only Priest Solalinde, but the shelter’s work team.

IV. ANALYSIS OF THE REQUIREMENTS OF SERIOUSNESS, URGENCY, AND IRREPARABLE HARM

19. The precautionary measures mechanism is part of the Commission’s functions of overseeing compliance with the human rights obligations established in Article 106 of the Charter of the Organization of American States. These general oversight functions are provided for in Article 41 (b) of the American Convention on Human Rights, as well as in Article 18 (b) of the Statute of the IACHR; while the mechanism of precautionary measures is set forth in Article 25 of the Commission’s Rules of Procedure. In accordance with this Article, the IACHR grants precautionary measures in urgent and serious situations in which these measures are necessary to avoid irreparable harm to persons or to the subject matter of a petition or case before the organs of the inter-American system.

20. The Inter-American Commission and the Inter-American Court of Human Rights (“the Inter-American Court” or “I/A Court H.R.”) have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.⁶ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.⁷ To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and how vulnerable the persons proposed as beneficiaries would be left in case the measures are not adopted.⁸ Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under study by the organs of the inter-American system. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations. In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

⁶ Inter-American Court of Human Rights (I/A Court H.R.), [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#), Provisional Measures regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; [Case of Carpio Nicolle et al. v. Guatemala](#), Provisional Measures, Order of July 6, 2009, considerandum 16.

⁷ I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; [Case of Bámaca Velásquez](#), Provisional measures regarding Guatemala, Order of January 27, 2009, considerandum 45; [Matter of Fernández Ortega et al.](#), Provisional measures regarding Mexico, Order of April 30, 2009, considerandum 5; [Matter of Milagro Sala](#), Provisional measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish).

⁸ I/A Court H.R., [Matter of Milagro Sala](#), Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; [Matter of the Criminal Institute of Plácido de Sá Carvalho](#), Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

- a. “serious situation” refers to a grave impact that an action or omission can have on a protected right or on the eventual effect of a pending decision in a case or petition before the organs of the inter-American system;
- b. “urgent situation” refers to risk or threat that is imminent and can materialize, thus requiring immediate preventive or protective action; and
- c. “irreparable harm” refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

21. In this sense, Article 25(7) of the Commission’s Rules of Procedure establishes that decisions granting, extending, modifying or lifting precautionary measures shall be adopted through reasoned resolutions. Article 25(9) sets forth that the Commission shall evaluate periodically, at its own initiative or at the request of either party, whether to maintain, modify or lift the precautionary measures in force. In this regard, the Commission shall assess whether the serious and urgent situation and the risk of irreparable harm that caused the adoption of the precautionary measures persist. Furthermore, it shall consider whether there are new situations that may meet the requirements outlined in Article 25 of its Rules of Procedure.

22. Similarly, the Commission recalls that while the assessment of the procedural requirements when adopting precautionary measures is carried out from a *prima facie* standard of review, keeping such measures in force requires a more rigorous evaluation.⁹ In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.¹⁰ The Inter-American Court has indicated that the passage of a reasonable period of time without any threats or intimidation, added to the lack of imminent risk, may lead to the lifting of international protection measures.¹¹

23. The Commission warns that the representation has not provided a response regarding this proceeding since June 30, 2017, despite the fact that the State’s reports have been forwarded and information has been requested on multiple occasions. Almost eight years have elapsed without an update.¹² The foregoing makes it difficult for this Commission to adequately carry out its mandate through the effective follow-up of these precautionary measures.

24. In the matter at hand, on April 23, 2010, precautionary measures were granted in favor of José Alejandro Solalinde Guerra, David Álvarez Vargas, Areli Palomo Contreras, Mario Calderón López, and Norma Araceli Doblado Abrego, who worked at the “Hermanos en el Camino” Migrant Shelter, due to threats and acts of violence against them. The Commission emphasizes that the information provided has focused on Father Alejandro Solalinde as the most prominent figure of the work team, followed by the security of the shelter, without referencing the other individuals identified in the resolution. Based on the information provided in the case file, the Commission notes the following:

- Personal safety of Father Alejandro Solalinde. Initially, a cell phone with pre-paid credit was provided, as well as telephone numbers of police corporations for emergencies. In January 2011, the SSPE designated four police officers as security agents, one was later shared with the shelter. By 2012, he continued to have four police officers armed and was equipped with radios for his own safety and that of the shelter, in addition to four PGJE officers assigned for his personal protection. Security measures were subsequently taken over by the PGR. A vehicle was also provided, including fuel and maintenance.

⁹ I/A Court H.R., [Case of Fernandez Ortega et al.](#), Provisional Measures regarding Mexico, Order of February 7, 2017, considerandums 16 and 17 (Available only in Spanish)

¹⁰ I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

¹¹ I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

¹² Subsequent to its last report, the Commission sent communications to the representation on October 15, 2017; August 4 and December 22, 2020; April 20, 2022; August 7, 2023; and January 3 and July 19, 2024. Although the representation sent communications on October 11, 2017, and May 9, 2022, they referred to processing and contact issues. On August 17, 2023, they sent a new communication, in which they reported not having received communications from Father Alejandro Solalinde. On January 3, 2024, the last report of the State was forwarded, reiterating the request of July 19, 2024, but there was no reply.

Due to reported challenges, it has been replaced and renewed at various times, the last change was in 2021 when a new vehicle was provided.

- **Safety at the shelter.** Protection measures have been implemented since 2010 with the installation of public lighting and other lighting fixtures; video cameras with a closed-circuit television system, which was updated and improved; fencing and chain-link fencing. In addition, police officers were assigned to protect the shelter —with the number of officers varying over time— along with security patrols. It was observed that there were opportunities to review these measures on an ongoing basis, while also responding to alerts about potential risk events, and that improvements and renovations were made to the shelter, and police resources and security and ballistic equipment were reinforced. The Commission observes that, according to the State's latest report from November 2023, there were 22 surveillance cameras connected to a closed-circuit television system and four motion-sensor floodlights.
- **Concertation meetings.** The following meetings are noted, in accordance with the information of both parties: January 26 and March 18, 2010 —before the granting—, May 14, 2010, May 6, 2011, April 30, 2012, July 11, August 20 and October 8, 2012 —with the Governor of Oaxaca—, April 3, 10, 11 and 24, 2017, February 13 and 26, May 30, June 5, September 2, November 4 and December 9, 2019, and February 25, 2020. These meetings facilitated progress in implementing precautionary measures, addressed challenges raised by the representation, and supported dialogue on matters related to Father Solalinde's work and that of his collaborators at the shelter. It should be noted that even the representation has acknowledged the State's response and confirmed that measures have been implemented. The IACHR positively values the spaces for direct dialogue between the parties and recalls the importance of the "dialogue to favor a real coordination of the implementation of the measures, in order to reasonably overcome the inconveniences that arise, and thus make effective the State's obligations of protection."¹³
- **Situations presenting a risk.** The following acts of harassment and threats in April 2012 by members of the GRU are particularly noteworthy: individuals in pick-up trucks who targeted the priest in March 2013; armed individuals who approached them in 2016; suspicious situations at events in October 2016, followed by surveillance; death threats on Twitter in March and April 2017; and a suspicious situation at an event, followed by a vehicle tailing them in April 2017. In addition to these situations, there have been statements made during protests, on the radio, and even by high-level public officials, which have contributed to the stigmatization of Father Solalinde at various times because of his work.

The Commission notes that these events reflected the persistence of the risk against Mr. Alejandro Solalinde during 2012 and 2017. Notably, the effectiveness of the security detail at various times stands out, as personal bodyguards responded to imminent threats and successfully protected him from potential harm. In addition, it should be noted that the State adapted and reinforced the security detail after learning of threats or acts of violence. Even after investigations were opened in which the perpetrators of threats against him could not be identified, it was decided to reinforce security to prevent dangerous acts from being carried out. The Commission does not have information to support the existence of an imminent risk after 2017 and the Commission stresses the importance of having updated information on the situation of risk on a regular basis.¹⁴ Notwithstanding the foregoing, the IACHR recognizes

work being done by civil society organizations and individuals in this area, by providing shelter, food, drinking water and other services to the migrants transiting through Mexican territory. The shelters provide security, food and

¹³ *Inter alia*, I/A Court H.R., [Matter of Castro Rodríguez regarding Mexico. Provisional Measures. Order of November 18, 2020](#), considerandum 19 (Available only in Spanish).

¹⁴ IACHR [Resolution 97/2024](#), Precautionary Measure No. 994-16, Matter of Lorenzo Mendoza and family regarding Venezuela, December 16, 2024, para. 17; and [Resolution 104/2024](#), Precautionary Measure No. 603-22, Child K.L.R regarding Mexico, December 27, 2024, para. 21 (Available only in Spanish).

information to thousands of people who pass through Mexico every year. These individuals and organizations are performing a vital social service, filling a void that the State has left for many years.” Institutions like the migrant homes, shelters, soup kitchens or grassroots community organizations like the Patrones and many others, provide services of vital importance to the migrants. The work being done by those who defend the human rights of migrants is of the utmost importance; despite the risks inherent in their work, they remain committed to defending the dignity and human rights of migrants. The Rapporteurship therefore recommended to the Mexican State that it “[e]nsure the security of defenders of migrants’ human rights.”¹⁵

25. When assessing compliance with procedural requirements, considering the analysis carried out, the Commission does not identify the existence of a current situation that places the proposed beneficiary at risk, along with the fact that the security arrangements and investigative measures have been adequate and effective, and have allowed the beneficiary and the shelter to carry out their human rights defense work. In this regard, considering the information provided and given the lack of updates for almost eight years, it is not possible to identify new situations of risk or shortcomings in the implementation of the precautionary measures. In this regard, the IACHR acknowledges the efforts made by the Mexican authorities to comply with this measure.

26. Considering the nature of the precautionary measures mechanism, the information available, and the analysis carried out, the Commission understands that it has no elements to support compliance with the requirements of Article 25 of its Rules of Procedure. Given the above, and taking into account the exceptional and temporary nature of precautionary measures,¹⁶ the Commission considers that it is appropriate to lift these measures.

27. The Commission emphasizes that regardless of the lifting of these measures, in accordance with Article 1(1) of the American Convention, it is the obligation of the State of Mexico to respect and guarantee the rights recognized therein. In this way, the permanence of protection measures at the domestic level is important, without prejudice to international protection that plays a complementary and subsidiary character. Taking into account that “when the risk to the life and personal integrity ceases, so too would the grounds for continuing to enforce the protection measures,” the State of Mexico is reminded of the importance of the internal authorities carrying out a risk assessment, with the participation of the beneficiaries, before deciding on the permanence of the protection measures.¹⁷

V. DECISION

28. The Commission decides to lift the precautionary measures granted in favor of José Alejandro Solalinde Guerra, David Álvarez Vargas, Areli Palomo Contreras, Mario Calderón López, and Norma Araceli Doblado Abrego, who worked or were staying at the “Hermanos en el Camino” Migrant Shelter in Mexico.

29. The Commission recalls that the lifting of these measures does not prevent the representation from filing a new request for precautionary measures, should they consider that there exists a situation presenting a risk that meets the requirements set forth in Article 25 of its Rules of Procedure.

30. The Commission instructs its Executive Secretariat to notify this resolution to the State of Mexico and to the representation.

¹⁵ IACHR, [Human Rights of Migrants and Other Persons in the Context of Human Mobility in Mexico](#), OEA/Ser.L/V/II. Doc. 48/13, December 30, 2013, para. 277.

¹⁶ I/A Court H.R., [Matter of Adrián Meléndez Quijano et al.](#), Provisional Measures regarding El Salvador, Order of August 21, 2013, para. 22; [Matter of Galdámez Álvarez et al.](#), Provisional Measures regarding Honduras, Order of November 23, 2016, para. 24 (Available only in Spanish).

¹⁷ IACHR [Resolution 9/24](#), Precautionary Measure No. 519-17, Eduardo Valencia Castellanos regarding Mexico, March 6, 2024, para. 35 (Available only in Spanish); [Resolution 20/2024](#), Precautionary Measure No. 887-19, Families of the Nueva Austria del Sira Community regarding Peru, April 10, 2024, para. 36; [Second report on the Situation of Human Rights Defenders in the Americas, December 31, 2011](#), OEA/Ser.L/V/II. Doc. 66, paras. 529, 531.

31. Approved on May 12, 2025, by Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Roberta Clarke; and Carlos Bernal Pulido, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary