

INTER-AMERICAN COMMISSION ON HUMAN RIGHTS RESOLUTION TO LIFT PRECAUTIONARY MEASURES 55/2025

Precautionary Measure No. 688-16
Érick Pérez *et al.* regarding Honduras
August 10, 2025
Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift the precautionary measures in favor of Erick Pérez et al.¹, in Honduras. Following the State's request to lift the measures, the Commission assessed the actions taken to implement the precautionary measures. The Commission also considered the extended period without facts that indicate an ongoing situation which places the beneficiaries at imminent risk. Upon not identifying compliance with the requirements set forth in Article 25 of its Rules of Procedure, the IACHR has decided to lift these precautionary measures.

II. BACKGROUND INFORMATION

2. On February 20, 2017, the Commission granted precautionary measures in favor of José Erick Pérez Sorto, Paul Emilio Zepeda, and Gabriela Blen and Georgina Sierra Rodríguez, members of *Oposición Indignada*, as well as their respective family units, in Honduras.² The request for precautionary measures alleged that members of *Oposición Indignada* were at risk due to their work as human rights defenders in the context of a series of actions taken against corruption in Honduras. Consequently, in accordance with Article 25 of its Rules of Procedure, the Commission requested that the State of Honduras: a) adopt the necessary measures to preserve the life and personal integrity of Mr. José Erick Pérez Sorto, Mr. Paul Emilio Zepeda, and Ms. Gabriela Blen, Ms. Georgina Sierra Rodríguez, members of *Oposición Indignada*, and their respective family units; b) adopt the necessary measures to ensure that the members of *Oposición Indignada* can carry out their activities as human rights defenders without being subjected to acts of violence and harassment in the exercise of their functions; c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and d) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

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

3. During the time the precautionary measures were in force, the Commission followed up on the situation by requesting information from both parties and has received a response on the following dates:

	Reports by the State	Communications by the representation	Information requested and forwarded by the Commission
2017	March 21	August 25	
2018	August 29 and September 25	September 20	July 27
2019	No information	No information	August 15
2020	No information	February 18 and September 9	
2021	December 7 and 15	No information	September 16
2022	No information	January 26 and December 20	January 28 and September 8

¹ Paul Emilio Zepeda, Gabriela Blen, Georgina Sierra Rodríguez and their respective family units.

² IACHR, Resolution 6/2017, Erick Pérez et al. regarding Honduras, Precautionary Measure No. 688-16, February 20, 2017 (Available only in Spanish).

2023	August 18	No information	June 1, August 15, and November 3
2024	No information	No information	January 18 and August 6
2025	June 18	No information	May 21

4. On November 3, 2023 the Commission requested information from the representatives to evaluate keeping these precautionary measures in force. On January 18 and August 6, 2024, the Commission reiterated these requests to the representatives. On May 21, 2025, the Commission requested information from both parties in order to assess keeping these precautionary measures in force. The State responded on June 18, 2025, requesting a review of the requirements of Article 25 of the Rules of Procedure of the IACHR. The representatives did not respond to the Commission and all deadlines have since expired.

5. On September 20, 2018, the Center for Justice and International Law (CEJIL) ceased its representation. Marcela Ortega and Gabriela Blen exert representation before the Commission.

A. Information provided by the State

6. In 2017, the State attempted to contact the beneficiaries. The Commission only received a response from the beneficiary Paul Emilio Zepeda. In 2018, the State highlighted that meetings of the Technical Committee of the National Protection Mechanism (*Comité Técnico del Mecanismo Nacional de Protección*) were held on March 28, May 4, and May 22, 2017, on behalf of the beneficiaries:

- i. José Erick Pérez: Agreed upon measures to install surveillance cameras in his residence; assign a liaison from the Protection System for emergency situations; grant him a beneficiary card for protection measures; provide a self-defense course, which was given on June 8, 2017; and send an official letter to the Public Prosecutor's Office requesting progress on the investigations. Based on the principle of willingness, no police measures were implemented in his favor.
- ii. Paul Emilio Zepeda: Agreed upon a liaison from the Protection System and the Security Office of the Human Rights Department was assigned for emergencies, and measures were taken to issue beneficiary cards for protection measures. The State reported making verification calls to the beneficiary in June 2017, during which the beneficiary stated that no new incidents had occurred. In 2018, the beneficiary did not respond to the risk reassessment.
- iii. Gabriela Blen: Agreed upon measures to install surveillance cameras in her residence; assign a liaison from the Protection System for emergency situations; grant her a beneficiary card for protection measures; and provide a self-defense course, which was given on June 8, 2017. On November 24, 2017, she confirmed compliance with these measures. However, she mentioned incidents that occurred against her in November 2017. Therefore, in March 2018, a female security agent was arranged with a corresponding relief shift to accompany her from 7:00 a.m. to 9:00 p.m. In June 2018, the State allegedly attempted to contact the beneficiary for a risk reassessment. However, she did not respond.
- iv. Georgina Sierra Rodríguez: Agreed upon measures to assign a liaison from the Protection System and the Security Office of the Human Rights Department in the case of emergencies. In addition, the Protection System carried out monitoring by means of telephone calls every 15 days. In 2018, she indicated that she was willing to undergo another risk reassessment.

7. The State reported that, on June 7, 2016, the National Protection Mechanism requested the implementation of protection measures in favor of Marcela Ortega and Ariel Varela, members of *Oposición Indignada*. However, despite the fact that both were under the Protection System, the measures allegedly could not be enforced because they left national territory.

8. In 2021, the State mentioned that all the beneficiaries had protection measures that were reportedly being complied with. Furthermore, they had not reported any incidents involving risk in the last two years. On December 7, 2021, a request was made to partially lift the precautionary measures in favor of Paul Emilio Zepeda, considering that the authorities had summoned him on several occasions to appear for a risk assessment but had not received a response. The State further indicated that he had stopped his human rights defense activities. In addition, the Public Prosecutor's Office explained that the complaint filed by Gabriela Blen and Erick Pérez in 2017 for the crime of threats was dismissed due to the lack of authorization from these individuals to conduct a criminal investigation.

9. In 2023, the State reported that the last Technical Committees of the National Protection Mechanism for beneficiaries were held on September 15, 2020, regarding José Erick Pérez Sorto; February 11, 2020, for Paul Emilio Zepeda; January 29, 2019, for Gabriela Blen; and October 18, 2019, for Georgina Sierra Rodríguez. Regarding Paul Emilio Zepeda, the State reiterated its request to partially lift the precautionary measures in his favor. In its last communication, the State specified that following was agreed upon:

- i. Erick Pérez: New police liaison with sufficient rank to make decisions when facing situations that placed him at risk; security cameras at his residence were reviewed; self-defense course in his favor; beneficiary card for protective measures; and referral of official letters to the Police Investigation Directorate on the status of the investigation into the crime of attempted murder against him in 2019, and to the National Electric Power Company for the repair of public lighting near the beneficiary's residence. It was observed that the beneficiary has not responded to the authorities since June 2021, when he indicated that "the Mechanism was only a temporary solution."
- ii. Gabriela Blen: It was decided that the assigned police liaison would be maintained, as well as the security cameras in her residential area; the installation of secure locks on the doors of her residence would be arranged; the help button was to be suspended at the request of the beneficiary due to malfunctioning; and refer the case to the Public Prosecutor's Office requesting the status of the complaints filed. She stated that she did not wish to conduct a new risk assessment until new authorities are appointed. It was noted that attempts had been made to contact her through various channels, but no response had been received.
- iii. Georgina Sierra Rodríguez: She declined the police protection measures and was therefore advised to report any risk-related incidents to the liaison officer, and it was agreed that her beneficiary card for protection measures would be renewed.

10. On June 18, 2025, the State reiterated information on protection measures in favor of the beneficiaries. In addition, regarding the beneficiary Paul Emilio Zepeda Castro, it was updated that the Protection Mechanism carried out a preliminary assessment of the beneficiary's moderate risk in 2019. Thus, the beneficiary was summoned to a meeting of the Technical Committee on three occasions (October 11, 2019, October 29, 2019, and January 9, 2020), but the beneficiary did not attend. According to the Honduran Protection System, no risk incidents have been reported in recent years involving beneficiaries, nor has there been any indication of their intent to continue participating in the Protection Mechanism based on the most recent communications. In this regard, on May 3, 2023, beneficiary Gabriela Blen stated that she did not want to undergo the risk assessment, and on March 2, 2021, beneficiary Paul Zepeda alleged that the Mechanism is a reported tool for "state persecution." Due to the aforementioned, it was requested to evaluate keeping these precautionary measures in force.

11. With regard to investigations, the Special Prosecutor's Office for Human Rights reported three complaints of electoral crimes and threats between 2015 and 2017,³ which are currently filed due to the fact

³ Regarding the complaints: 1. Complaint No. 1496429651-2017, dated June 2, 2016, filed by the General Directorate of Protection System against unidentified individuals for the crime of threats against Gabriela Blen and José Erick Pérez. On November 16, 2020, the complaint was administratively dismissed because authorization from the victims could not be obtained, which is essential for

that the acts do not constitute crimes, the victims' refusal to authorize further investigation, or insufficient evidence. For its part, the Special Prosecutor's Office for the Protection of Human Rights Defenders and Social Communicators has a complaint in 2020 against Georgina Maribel Sierra for the crime of discrimination which has been filed.⁴ On March 3, 2020, the case was administratively closed after it was determined that the conduct did not constitute the criminal offense of discrimination.

B. Information provided by the representation

12. In 2017, it was reported that Gabriela Blen was detained on August 21 while traveling from Santa Lucía Valle de Ángeles to the city of Tegucigalpa. According to the representatives, while she was travelling, a police checkpoint detained her for several minutes for no apparent reason. While she was detained, she reported the incident to her police liaison and the Minister of Security but did not receive a response. After insisting, the police allowed her to continue on her way. However, a car followed her until she reached the city of Tegucigalpa.

13. In 2018, the representatives stated that the only protection measure implemented by state authorities in favor of the proposed beneficiary Marcela Ortega was the issuance of an identification card as a beneficiary of the Protection System. It was alleged that the defamation campaign against members of the *Oposición Indignada* continued. In 2020, it was reported that the National Protection Mechanism provided protection measures in favor of beneficiaries, such as the installation of security cameras. Due to new incidents, Gabriela Blen requested a permanent security agent. This measure was approved almost a year after the request. However, her security agent was only available from 8:00 a.m. to 5:00 p.m., and the beneficiary was responsible for covering the agent's food and transportation expenses, which ultimately forced her to forgo this protection measure. In 2018, a risk assessment was carried out regarding Gabriela Blen and authorities determined that her risk had decreased, despite reports of threats, persecution, and stigmatization against her. Gabriela Blen stated that the National Protection Mechanism had requested an updated risk assessment for her case, which she declined, citing that the previous assessment had already denied the protection measures she had requested.

14. In 2021, Gabriela Blen reported that on January 13, members of the National Civil Police had visited her, but she was not informed of the reasons for their visit, which caused her to fear for her safety. Gabriela Blen highlighted that she has not filed any complaints before the Public Prosecutor's Office because the incidents reported in the past had not been investigated. The representatives indicated that the other beneficiaries were no longer residing in Honduras, as they had been granted political asylum and were now engaged in other endeavors.

15. In 2022, Georgina Sierra Rodríguez stated that the beneficiaries are no longer within Honduran territory due to the danger they face in the country, and added that she had to leave Honduras. She also indicated that she had a liaison with the National Civil Police since 2010. However, the beneficiary claimed that the police had been infiltrated by organized crime.

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

public action dependent on a private entity; 2. Complaint No. 1511469901-2017, concerning electoral crimes against Georgina Maribel Sierra, dated November 21, 2017. On May 16, 2023, it was decided to administratively close the complaint because the facts did not constitute criminal offenses established in the Criminal Code; 3. Complaint No. 1435855968-2015, against police officers, for the crime of threats against Ariel Fabricio Varela and others. On December 3, 2021, an administrative closure order was issued due to lack of sufficient evidence.

⁴ Complaint No. 1578930903-2020, regarding the crime of discrimination against Georgina Maribel Sierra, dated January 15, 2020. On March 3, 2020, the case was administratively closed after it was determined that the conduct did not constitute the offense of discrimination.

16. 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 established in Article 41(b) of the American Convention on Human Rights, as well as in Article 18(b) of the IACHR Statute. 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.

17. 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.⁵ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.⁶ To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and the vulnerability to which the persons proposed as beneficiaries would be exposed if the measures are not adopted.⁷ Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under consideration 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:

- 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.

18. 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 evaluate 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.

⁵ 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.

⁶ Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Resolution of February 8, 2008, considerandum 8; Matter of Bámaca Velásquez, Provisional Measures regarding Guatemala, Resolution of January 27, 2009, considerandum 45; Matter of Fernández Ortega et al., Provisional Measures regarding Mexico, Resolution of April 30, 2009, considerandum 5; Matter of Milagro Sala, Provisional Measures regarding Argentina, Resolution of November 23, 2017, considerandum 5.

⁷ 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).

19. Similarly, while the assessment of the procedural requirements when adopting precautionary measures is carried out from a *prima facie* standard, keeping such measures in force requires a more rigorous evaluation.⁸ In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.⁹ 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.¹⁰

20. In this matter, the Commission recalls that the precautionary measures were granted in 2017 in favor of Erick Pérez, Paul Emilio Zepeda, Gabriela Blen, and Georgina Sierra Rodríguez, then identified members of the organization *Oposición Indignada*, due to the risk they faced as a result of their work in defense of human rights, particularly in the context of actions taken against corruption in Honduras. The precautionary measures also included their family units.

21. When analyzing keeping these precautionary measures in force, the Commission observes that the State requested the partial lifting of these measures regarding the beneficiary Paul Emilio Zepeda on December 7, 2021. Pursuant to Article 25 (9) of its Rules of Procedure, this request was forwarded to the representatives in a timely manner in order to request their comments. On November 3, 2023, the Commission requested updated information from the representatives in order to assess keeping the measures in force, and reiterated this request on January 18 and August 6, 2024. On May 21, 2025, the Commission again requested information from both parties in order to assess keeping these precautionary measures in force. On June 18, 2025, the State responded and requested that the precautionary measures be completely lifted. However, the representatives have not responded to the Commission in the last two years and six months. The last communication from the representatives, dated December 2022, indicated that most of the beneficiaries had left the country.

22. The Commission confirms that the State submitted reports between 2017 and 2020 on the implementation of protection measures in favor of beneficiaries, as well as on the conduct of risk assessments to determine the protection measures to be taken on their behalf. On June 18, 2025, the State reported that no incidents of risk had been reported in recent years with regard to beneficiaries and that the voluntary nature of their participation in the Protection Mechanism had not been verified. When analyzing the current information on the beneficiaries, the Commission understands that the factual circumstances have changed significantly:

- i. Regarding José Erick Pérez Sorto, Paul Emilio Zepeda, and Georgina Sierra Rodríguez, the representatives reported that they have not been residing in Honduras since at least 2021, following their requests for political asylum abroad. In addition to the above, no specific information has been received on their situation in the last two years, despite repeated requests for updates sent by the IACHR. In view of the above, it is concluded that it is not possible to identify, at this time, the continuation of a serious and urgent risk within the terms of Article 25 of its Rules of Procedure.
- ii. Regarding Gabriela Blen, who reportedly still resides in Honduras, the Commission notes that the last risk assessment in her favor was conducted on January 29, 2019, which resulted in the determination of specific protection measures. After this study, she reportedly refused to update her risk assessment. Notwithstanding, the Commission does not have details on her situation since January 2021, more than four years having elapsed since then. The lack of information on her situation has persisted despite the Commission's repeated requests for information. Consequently,

⁸ I/A Court H.R. *Fernández Ortega et al.*, Provisional Measures regarding Mexico, Order of February 7, 2017, paras. 16 and 17.

⁹ I/A Court H.R., *Case of Fernández Ortega et al.*, previously cited.

¹⁰ I/A Court H.R., *Case of Fernández Ortega et al.*, previously cited.

the Commission also does not have any updated information that indicates that a serious and urgent situation pursuant to Article 25 of its Rules of Procedure continues to exist.

- iii. With regard to the beneficiaries' family units, the Commission states that it does not have any information on their current situation. In this regard, there are no elements to assess whether the provisions of Article 25 of its Rules of Procedure are met.

23. In summary, the Commission considers that it does not have sufficient elements of assessment to identify a current imminent risk to the beneficiaries. In view of the above, and taking into account that exceptional and temporary nature of precautionary measures,¹¹ the Commission considers that it currently has no elements to support compliance with the requirements of Article 25 of its Rules of Procedure, and that it is appropriate to lift these precautionary measures.

24. Lastly, 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 Honduras to respect and guarantee the rights recognized therein, including the life and integrity of the beneficiaries in Honduras. This responsibility remains in effect even after the lifting of these precautionary measures.

V. DECISION

25. The Commission decides to lift the precautionary measures granted in favor of José Erick Pérez Sorto, Paul Emilio Zepeda, and Gabriela Blen and Georgina Sierra Rodríguez, then members of *Oposición Indignada*, as well as their respective family units, in Honduras.

26. The Commission recalls that the lifting of the 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.

27. The Commission instructs its Executive Secretariat to notify this resolution to the State of Honduras and to the representatives.

28. Approved on August 10, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; and Roberta Clarke, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary

¹¹ 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.