

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 56/2025**

Precautionary Measures No. 549-25 and 688-25

Pedro Miguel Guanipa Villalobos and Rafael Arturo Ramírez Colina
regarding Venezuela
August 15, 2025
Original: Spanish

I. INTRODUCTION

1. On May 5 and 26, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received requests for precautionary measures filed by *Observatorio Venezolano de Prisiones* - Venezuelan Observatory of Prisons (“the requesting party”) urging the Commission to request that the Bolivarian Republic of Venezuela (the “State” or “Venezuela”) adopt the necessary measures to protect the rights of Pedro Miguel Guanipa Villalobos and Rafael Arturo Ramírez Colina (“the proposed beneficiaries”). The requests alleged that the proposed beneficiaries are members of the opposition political party *Primero Justicia* and public officials of the municipality of Maracaibo. The latter was the mayor in office when he was detained. Both individuals are being allegedly held in solitary confinement and incommunicado. In addition, there is no information about their health or detention conditions in Venezuela.

2. Pursuant to Article 25 (5) of its Rules of Procedure, the Commission requested information from the State on May 13 and June 23, 2025, according to the corresponding records. The applicants provided information on July 4, 8, 12, and 14, 2025. To date, the IACHR has not received a response from Venezuela and the granted deadline has expired.

3. Upon analyzing the submissions of fact and law furnished by the applicants, the Commission understands that the beneficiaries are in a serious and urgent situation, given that their rights to life, personal integrity, and health are at risk of irreparable harm. Therefore, pursuant to Article 25 of its Rules of Procedure, the Commission requests that Venezuela: a) adopt the necessary measures to protect the rights to life, personal integrity, and health of the beneficiaries; b) implement sufficient measures to ensure that their detention conditions are compatible with applicable international standards. In particular, the following: i. facilitate contact with their family members, representatives, and trusted attorneys, and grant them full access to the judicial file; ii. officially report on the legal situation of the beneficiaries in the framework of the criminal proceedings in which they are allegedly involved; and iii. immediately carry out a medical assessment of their health, as well as guarantee access to the necessary medical care and treatment; c) implement the necessary measures so that the beneficiaries can carry out their activities as opposition political leaders without being subjected to threats, harassment, intimidation or acts of violence; d) consult and agree upon the measures to be implemented with the beneficiaries and their representatives; and e) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

II. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

- PM-549-25 (Pedro Miguel Guanipa Villalobos)

4. He was leader of the Independent Committee for Political Electoral Organization (*Comité de Organización Política Electoral Independiente*, COPEI), and subsequently leader of the *Primero Justicia* Party. At

the time of his detention, he was the vice president of the organization for *Primero Justicia* in the state of Zulia. In addition, he is the brother of political leaders Juan Pablo and Tomás Guanipa. He had been discharged from psychiatric treatment, remained under follow-up by the same specialty, and began a security protocol, staying at a safe location, since September 24, 2024.

5. On September 26, 2024, officials of the Bolivarian National Intelligence Service (SEBIN) detained the proposed beneficiary as he was preparing to travel from Maracaibo to Miami, Florida, United States. He had rescheduled his flight after receiving information that he might be detained which ultimately occurred at the SAIME Border Control Office in Paragachón, on the Colombia–Venezuela border.

6. At around 7:00 a.m., the driver who accompanied him informed his family members that the immigration official had asked the proposed beneficiary for his identification document for verification purposes. After the driver refused to continue answering her questions for fear of reprisals, at approximately 10:00 a.m., the proposed beneficiary's wife was informed by a third party that the proposed beneficiary had been handcuffed and taken in one of the SEBIN trucks to its facilities in Maracaibo. Around 1:00 p.m., family members showed up at the facility. After initially denying that the proposed beneficiary was in their custody, at around 3:00 p.m. they confirmed that he was indeed being held there and that food could be brought to him. Family members were not able to see him or verify his physical state.

7. That same night, SEBIN officials in Maracaibo contacted the family physician to verify the detainees' health. This physician, who was a friend of the family, was the only source of information and indicated that the proposed beneficiary had very high blood pressure, despite not having been hypertensive previously. The proposed beneficiary's family claimed that SEBIN agents had requested an extensive list of supplies, including medicine, personal items, mattresses, a refrigerator, a stove, and other items. There is no evidence that they have been delivered and supplied to the proposed beneficiary.

8. The request stated that the proposed beneficiary has been a bariatric patient since April 2022, after undergoing sleeve gastrectomy for grade II obesity. This intervention reportedly requires a strict diet and continuous medical follow-up. In addition, he has had gallbladder surgery, has psoriasis (a chronic skin condition) and osteoarthritis in both shoulders. These health issues require specialized attention. In September 2024, the proposed beneficiary was diagnosed with a major depressive episode with psychotic symptoms, requiring him to receive psychiatric treatment with biweekly follow-up.

9. On October 1, 2024, restrictions on the proposed beneficiary were increased when the mayor of Maracaibo, the director general of Citizen Security, and the mayor's private secretary were detained. On October 4, 2024, the Director of Human Resources of the mayor's office was also detained. All of these individuals were singled out by Venezuela's Minister of Interior, Justice, and Peace, Diosdado Cabello, as part of a corruption scheme. Throughout that same month, the minister stated on his program "Con el Mazo Dando" and during press conferences that the proposed beneficiary and his colleagues were linked to drug trafficking networks and to the misuse of public funds to finance the campaign of candidate María Corina Machado.

10. On October 4, 2024, while his family members waited outside the SEBIN facilities in Maracaibo, a vehicle with a judge and two public defenders arrived at the scene. It was reported that a hearing to present the detainees was scheduled, but it could not take place because the judge declared himself incompetent. The family unit mentioned that, at that point in time, they did not know the charges against the proposed beneficiary.

11. On October 7, 2024, SEBIN officials left through a different door and headed toward a path that led to the airport. Minutes later, an acquaintance at the airport told them that two planes with SEBIN officials had taken off. An agent who identified himself as "the person authorized to provide information" then stated that the proposed beneficiary and the rest of the people detained at the mayor's office had landed in Caracas. Hours later, another detainee alerted the proposed beneficiary's wife about the appointment of a public

defender. The proposed beneficiary's wife stated that she had not been contacted by the aforementioned defender, who then claimed that he had attempted to contact her but had dialed the wrong number.

12. On October 9, 2024, the public defender in Caracas reported that the proposed beneficiary was brought before the Fourth Court for the Control of Corruption, Terrorism, and Organized Crime and charged with the following crimes: (i) unlawful appropriation of government property; (ii) embezzlement of public funds; (iii) procurement fraud/conspiracy to defraud in contracting; (iv) money laundering; and (v) conspiracy. The defender added that the process is currently in the oral and public trial phase. The proposed beneficiary's wife noted that the defense attorney assumed she was already aware that he had been beaten at the time of his detention as he stated: 'He is better now, and they didn't beat him this time.' However, upon realizing that she did not know about this incident, the defender attempted to correct the statement.

13. After the proposed beneficiary was transferred to SEBIN El Helicoide, his residence in Maracaibo was monitored 24 hours a day by agents of the same agency. On October 16, 2024, unusual activity was reported and captured by security cameras at the premises: trucks from the Venezuelan oil company PDVSA, men dressed in red, and motorcycles were seen circling the residence. The mobilization was so intense that family members feared the residence would be raided.

14. Given that the proposed beneficiary was in El Helicoide, his wife had to travel constantly and stay at the residence of Tomas Guanipa Villalobos, the proposed beneficiary's brother. Since she has been staying there, it has been reported that the residence is under constant surveillance by SEBIN officials, who are usually dressed in civilian clothes, follow anyone who leaves the residence, and take photographs. Given her brother-in-law's political activity, the proposed beneficiary's wife states that they have always been besieged by the SEBIN, even when his brother was abroad. However, since his brother was arrested, the situation allegedly worsened.

15. Throughout October and November 2024, Minister Cabello allegedly played videos of the proposed beneficiary testifying in a completely altered state (as if under the influence of drugs). During episode 502 of "Con el Mazo Dando," when responding to a comment from the proposed beneficiary's brother, Juan Pablo, and referring to the confession videos, he said, *"his own brother was the one who said that he took money and gave it to him."*

16. By October 2024, the Public Prosecutor's Office had allowed some communication through "slips of paper" that were supposedly written by the detainees, but did not allow the families to respond. It was indicated that they could bring lunch to the detainees every day. Of the 15 people who were detained, only four were not allowed visitors, and three of them were among those accused of corruption in Maracaibo (the proposed beneficiary, the then mayor Ramírez, and director David Barroso). The fourth individual who was not allowed visitors was journalist Ronald Carreño. In November 2024, relatives of other detainees who were able to receive visits reported that, following a search, conditions became more restrictive. Custody was transferred to SEBIN officers, limiting the use of the 'slips of paper' and reducing parcel deliveries from three times a week to twice a week. As a result, the detainees' communication depended on the solidarity of other inmates, through whom they sometimes sent short messages. The relatives of the other detainees shared that SEBIN agents became aware of this flow of information, and in early January 2025, the four individuals were separated and relocated to a cell. None of them have been able to receive visits, which has worsened their isolation.

17. In January 2025, the proposed beneficiary's wife, along with relatives of the other detainees, sent a letter to SEBIN requesting permission to visit them. However, that letter was not received at El Helicoide. On January 28, 2025, she submitted the request at the headquarters. The clerk who received the letter replied that, given the sensitive nature of the matter, she needed to request authorization. After a two-hour wait, the letter was returned without proof of receipt, and the proposed beneficiary's wife was advised to wait for a call regarding the visit. She also attempted to file a complaint with the General Directorate for the Protection of

Human Rights of the Public Prosecutor's Office in order to report the proposed beneficiary's situation, but it was not received. Throughout that month, a driver who worked with the proposed beneficiary's wife in Caracas was detained for several hours by SEBIN agents, who attempted to persuade him to infiltrate the proposed beneficiary's family. After the incident, the driver decided to leave the country.

18. On January 27, 2025, the preliminary hearing for the proposed beneficiary and the group of detainees in Maracaibo was held at around 8:00 p.m. After 40 minutes, the public defender informed the family members that he had been able to see the detainees virtually and that he had requested measures (without specifying the scope of the request), but that the judge had not accepted them and had upheld the charges. It was indicated that the detainees reported the lack of communication and restriction of visits. The counsel explained to the families that, since it was a restricted file, he was only permitted to take notes, which constituted the information he was sharing with them. On February 6, 2025, the proposed beneficiary's wife filed a written complaint with the Ombudsperson's Office regarding serious human rights violations against her husband. The complaint was received but has not been answered. On February 26, 2025, during the program "Con el Mazo Dando", Minister Cabello described the proposed beneficiary as "(...) *the leader of the corruption plot of the Mayor's Office of Maracaibo*".

19. The families were unable to obtain information on the criminal record as it was restricted. However, during the week of April 7, 2025, after the case advanced to the oral and public trial phase, his family members learned that it had been assigned to the Second Special Court of First Instance of the State, operating in trial functions, with jurisdiction over crimes associated with terrorism at the national level, as well as the authority to hear and decide cases involving related offenses connected to corruption and organized crime within the Judicial Circuit of Caracas.

20. In June and July 2025, they reiterated that the proposed beneficiary remains in prolonged solitary confinement, incommunicado, without the right to defense (unable to appoint a private defense attorney), and that they have not received any information on his health since he was detained. Although his wife supplies him with medication on a regular basis through SEBIN officers, she is unable to confirm that her husband is receiving them. As far as she is concerned, there is no proof that her husband is alive beyond the dirty clothes that are delivered to her and the alleged requests he makes through the agents. The family is reportedly publicly denouncing the situation before the media.

- **PM-688-25 (Rafael Arturo Ramírez Colina)**

21. The proposed beneficiary is a member of the National Board of Directors of the opposition political party *Primero Justicia* and has served as mayor of the municipality of Maracaibo, in Zulia state, since December 3, 2021. The applicant added that the proposed beneficiary's situation was due to political persecution for his support for Edmundo González's presidential candidacy, which he had publicly expressed while mayor of Maracaibo. On October 1, 2024, he agreed to meet with the Director of the Municipal Police of Maracaibo at the Quinta Villa Carmen Cultural Center. When the proposed beneficiary arrived at the location at around 6:30 p.m., he was detained without a warrant by hooded SEBIN agents dressed in black. The applicant states that this meeting was a trap.

22. The request stated that the proposed beneficiary was detained along with the Director General of Citizen Security of the municipality of Maracaibo, two bodyguards who were accompanying him, and the Protection, Control, and Heritage official in charge of guarding the site.¹ The same day, the Director of the Mayor's Private Secretariat was detained, and on October 4, 2024, the Director of Human Resources for the municipality was also detained. The applicant stated that the proposed beneficiary's detention had sparked a climate of persecution and intimidation against councilors, directors, and career staff of the Maracaibo Mayor's Office. The town hall premises had been taken over by SEBIN agents and the General Directorate of Military

¹ On the night of October 1, 2024, the two bodyguards and the Protection, Control and Heritage (PCP) official were released.

Counterintelligence (DGCIM). As a result, the staff had been reluctant to show up for work and this initially prevented the City Council, mostly made up of opposition members, from meeting to appoint an acting mayor. On October 10, 2024, an acting mayor was appointed.

23. After being detained, the proposed beneficiary was transferred to SEBIN Maracaibo. His wife was informed of this by Pedro Miguel Guanipa Villalobos' wife, who was at that location attempting to obtain news about her husband. Ramírez Colina's wife decided to approach the headquarters, and an official confirmed that the proposed beneficiary was detained. At that moment, her husband's personal belongings were handed over to her. During the entire time he was held there, his family members were not allowed to visit him or communicate with him in any way. On October 1, 2024, at around 8:00 p.m., following the detention, SEBIN agents, along with one of the proposed beneficiary's bodyguards, allegedly entered the family's apartment without a search warrant. It was reported that his daughter's computer was stolen. Subsequently, around 10:00 p.m., the same agents and the bodyguard reportedly entered the apartment again. Fearing that the agents would return, the proposed beneficiary's wife and children changed the lock on the front door and moved out for two weeks.

24. On October 2, 2024, the Public Prosecutor's Office issued a press release confirming that the proposed beneficiary had been detained. They further announced that he would reportedly be brought before the court hearing the case in the coming hours, along with other individuals who had been detained. Between October 2 and 3, 2024, a trusted attorney attempted to file a motion for his appointment as private counsel. However, it was rejected on the grounds that "it was not allowed". On October 3, 2024, the proposed beneficiary's wife and sisters held a press conference denying the accusations against him and his team.

25. On October 9, 2024, the proposed beneficiary was transferred to the SEBIN headquarters of El Helicoide, without prior notification to his family members. On the same day, Public Defender No. 41 of Caracas allegedly sent a *WhatsApp* message to his wife, informing her that the preliminary hearing in the case against the proposed beneficiary had been held that evening before the Fourth Court for the Control of Corruption, Terrorism, and Organized Crime.

26. On October 9, 2024, Ramírez Colina's wife, along with relatives of other detainees from the municipality of Maracaibo,² traveled to Caracas to meet with the appointed public defender. He allegedly told them that the file was restricted and that he had not been able to read it. They were informed that the charges against them are as follows: embezzlement or misappropriation of public funds; misuse of public funds; collusion in contracting; money laundering; and criminal conspiracy. The request states that the relatives visited the public defender's office on several occasions but observed no progress in the defense. On January 27, 2025, the public defender reported that the preliminary hearing had been held, at which the judge upheld all charges, meaning that the case had moved on to the oral and public trial phase. The request reported that the family members are not aware of the actions that the public defender takes in their favor nor do they have access to the file.

27. On October 9, 2024, the proposed beneficiary's family members went to SEBIN El Helicoide. It was reported that the prison agents gave the relatives a long list of supplies they were required to purchase and provide for the detainee in order to gain admission: a mattress, sheets, pillows, towels, personal hygiene products, light blue clothing (the uniform), food, a refrigerator, an electric stove, an air conditioner, rechargeable light bulbs, rubber shoes without laces, and plastic items such as cups, forks, plates, chairs, and

² David Darío Barroso Chirinos (General Director of Citizen Security), Pedro Miguel Guanipa Villalobos (Mayor's Office Director), Margarita Paulina Assenza Arteaga (Director of the Mayor's Private Secretariat Office) and Diana Patricia Berrio Morelo (Director of the Human Resources Directorate).

tables. His wife was told that the proposed beneficiary prepares his own meals, but she does not know how or what he cooks.³

28. On February 6, 2025, the proposed beneficiary's wife filed a written complaint with the Human Rights Directorate of the Public Prosecutor's Office alleging violations of due process, the right to health, and the physical, mental, and moral integrity of her husband. In particular, in that document, she requested "(...) that the appropriate measures be taken so that, with the urgency of the case, I be authorized and provided with information on his health and that visits be authorized (...)" She did not receive a response to her request. On the same day, she submitted the same claim in writing to the Ombudsperson's Office. On March 11, 2025, she was assisted by an attorney from that institution, but was unable to help, considering that "it was an emblematic case." The applicant maintained that the Ombudsperson's Office has not executed actions to defend the rights of the proposed beneficiary. In short, it was reported that officials from that institution are prohibited from visiting SEBIN headquarters at El Helicoide.

29. On February 19, 2025, the proposed beneficiary's wife and other family members of detainees gathered at the Plazoleta de la Basílica Nuestra Señora de Chiquinquirá to denounce the isolation and lack of communication with their loved ones.⁴ On March 26, 2025, the proposed beneficiary's sisters publicly denounced the lack of communication, visits, calls, and information on his health since the date of his detention.⁵

30. Regarding his health issues, the proposed beneficiary allegedly has systemic hypertension and venous insufficiency in the lower limbs, as stated in the report issued by the cardiologist at the Maracaibo Cardiovascular Specialty Center on December 30, 2024. That report also emphasizes that he requires certain medications. Another report dated July 7, 2025, from the same cardiologist was attached. It reported on the care provided to the proposed beneficiary since 2008 and warned that "[p]ermanent medication is necessary as inadequate control of systemic blood pressure can lead to stroke, myocardial infarction, heart failure, renal failure, and/or blindness."

31. The request mentioned that the proposed beneficiary's wife has been consistent in delivering his regular medications, but she has no proof that he receives them. In addition, it was indicated that the officials only read out short notes allegedly written by the proposed beneficiary where he requests medicines, personal items, or food. The applicants noted that these notes often included medications that weren't prescribed by his physician, which could suggest that he has been experiencing other health issues. His wife asked the prison officials why her husband was being given these new medications, but she has not received any explanation. For example, in January 2025, his wife inferred that the proposed beneficiary had a stomach problem and diarrhea, as *enterogermina* and serum were included in the list of medications. Upon questioning prison officials, they did not provide a diagnosis or details about his issues, nor did they provide a medical certificate detailing his state of health. Furthermore, his wife claims that the detainees at SEBIN headquarters in El Helicoide are self-medicating, as she has not received any prescriptions issued by a health professional. This suggests that prison officials with no medical knowledge are prescribing the medication. The applicants warned that the only proof of life they have of the proposed beneficiary is the dirty clothes his wife collects every week from the place of detention and the medicines he allegedly requests.

³According to reports, the proposed beneficiary's wife brings him lunch every day so that he only has to prepare breakfast and dinner. On Tuesdays and Thursdays, she sends him frozen food, cheese, flour, and rice, as well as sheets, towels, clean clothes, and the medications he allegedly requests.

⁴ The proposed beneficiary's wife states the following: "There are no calls, no visits. We cannot verify his health or physical condition. He has not been allowed a private defense or lawyers of his choice (...). We call for the release of the five detainees, a call for the release of all political prisoners."

⁵ Committee for the Freedom of Political Prisoners, [@ clippeve], (March 26, 2025), Sisters of the mayor of Maracaibo, Rafael Ramírez Colina, a political prisoner in El Helicoide, demand his immediate release [Tweet], <https://x.com/clippeve/status/1904968793576579427>

32. It was reported that the lack of contact with the proposed beneficiary has affected his two children, aged 17 and 10. In that context, the applicants described the proposed beneficiary's prolonged isolation as an act of torture, cruel, inhuman, or degrading treatment.

33. Lastly, it was highlighted that on October 2, 2024, the Minister of Interior, Justice, and Peace, Diosdado Cabello, allegedly discredited the proposed beneficiary, claiming that "when the Venezuelan opposition reaches a position of public importance, what it does is steal." He further insinuated that "he does not believe that Mayor Ramírez Colina will be able to regain his freedom." Along these lines, several excerpts from the television program "Con el Mazo Dando" and press conferences were attached in which the aforementioned Minister refers to the proposed beneficiary before and after being detained. For example, on September 11, 2024, the Minister accused the proposed beneficiary of financing Juan Pablo Guanipa with public funds with the aim of "conspiring against the country and against State institutions."⁶ On March 22, 2025, the Minister stated that the funding received by María Corina Machado came from drug trafficking and that there is a link between the proposed beneficiary and Pedro Guanipa, brother of Juan Pablo Guanipa, who is currently in custody.⁷

B. Response from the State

34. The Commission requested information from the State on May 13 and June 23, 2025. To date, no information has been received from the State, and the granted timeline has expired.

III. ANALYSIS OF THE ELEMENTS OF SERIOUSNESS, URGENCY, AND IRREPARABLE HARM

35. The precautionary measures mechanism is part of the Commission's function of overseeing compliance with the human rights obligations set forth 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. The mechanism of precautionary measures is set forth in Article 25 of the Commission's Rules of Procedure. In accordance with that Article, the Commission grants precautionary measures in serious and urgent situations in which these measures are necessary to avoid irreparable harm to persons.

36. The Inter-American Commission and the Inter-American Court of Human Rights (hereinafter "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.⁸ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.⁹ To do this, the IACHR shall assess the problem raised, the effectiveness of State actions to address the situation, and how vulnerable the proposed beneficiaries would be left in case the measures are not adopted.¹⁰ As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR.

⁶ YouTube, [Con el Mazo Dando – Episode 494](#), September 11, 2024, timestamp 3:30:00.

⁷ YouTube, [Press conference statements by Diosdado Cabello this Saturday](#), March 22, 2025, time stamp 10:09.

Inter-American 8 Court of Human Rights (I/A Court H.R.), 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.

⁹ 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).

¹⁰ 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).

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 (*effet utile*) of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.¹¹ 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.

37. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt; rather, the information provided should be assessed from a *prima facie* standard of review to determine whether a serious and urgent situation exists.¹² Similarly, the Commission recalls that, by its own mandate, it is not in its purview to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.¹³ This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be resolved without making any determination on the merits.¹⁴

38. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,¹⁵ and has included the country in Chapter IV.B of its Annual Report. The Commission has also issued press releases and country reports, and established a special follow-up mechanism for the country, known as MESEVE.

39. In 2024, the Commission condemned the practices of institutional violence in the context of the electoral process in Venezuela, such as violent repression, arbitrary detentions, and political persecution.¹⁶ The strategy of detention and criminalization appears to be specifically targeted at individuals perceived as opponents of the regime, including journalists, opposition leaders, human rights defenders, and others.¹⁷ On

¹¹ 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 7; [Matter of “El Nacional” and “Así es la Noticia” newspapers](#), Provisional Measures regarding Venezuela, Order of November 25, 2008, considerandum 23; [Matter of Luis Uzcátegui](#), Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19 (Available only in Spanish).

¹² I/A Court H.R., [Matter of Members of the Miskitu Indigenous Peoples of the North Caribbean Coast regarding Nicaragua](#), Extension of Provisional Measures, Order of August 23, 2018, considerandum 13 (Available only in Spanish); [Matter of children and adolescents deprived of liberty in the “Complexo do Tatuapé” of the Fundação CASA](#), Provisional Measures regarding Brazil, Order of July 4, 2006, considerandum 23.

¹³ IACHR, [Resolution 2/2015](#), Precautionary Measure No. 455-13, Matter of Nestora Salgado regarding Mexico, January 28, 2015, para. 14; [Resolution 37/2021](#), Precautionary Measure No. 96-21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

¹⁴ In this regard, the Court has stated that “[it] cannot, in a provisional measure, consider the merits of any arguments pertaining to issues other than those which relate strictly to the extreme gravity and urgency and the necessity to avoid irreparable damage to persons.” I/A Court H.R., [Matter of James et al. regarding Trinidad and Tobago](#), Provisional Measures, Order of August 29, 1998, considerandum 6 (Available only in Spanish); [Case of the Barrios Family v. Venezuela](#), Provisional Measures, Order of April 22, 2021, considerandum 2 (Available only in Spanish).

¹⁵ IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, para. 1.

¹⁶ IACHR, [Press Release No. 184/24](#), IACHR and SRFoE condemn State terrorism practices in Venezuela, August 15, 2024.

¹⁷ IACHR, Press Release No. 184/24, previously cited.

December 27, 2024, the IACHR approved the report titled “Venezuela: Serious Human Rights Violations in connection with the Elections” and reaffirmed that the State has been engaging in practices such as the arbitrary detention of opponents, human rights defenders, and social leaders,¹⁸ while using “terror as a tool of social control.”¹⁹

40. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.²⁰ The IACHR identified that relatives have not yet received a formal communication about the detention center where their loved ones are held.²¹ In other cases, they have only been able to find out that they are alive and where they are being held through information shared by other inmates, or because officials from the Bolivarian National Intelligence Service call them to ask them to bring medicine or collect dirty clothes for washing.²² During its 192nd session in February and March 2025, the Commission was able to obtain information on the situation of persons deprived of their liberty in the post-election context and received testimonies from relatives of victims and civil society on arbitrary detentions, torture, and serious detention conditions.²³

41. Consequently, the Commission understands that the circumstances surrounding the proposed beneficiaries’ detention and their detention conditions, along with the IACHR monitoring of the situation in the country, are relevant to the analysis of the procedural requirements. The above, to the extent that they give seriousness and consistency to the allegations raised.

42. With regard to the requirement of *seriousness*, the Commission considers that it has been met. In reaching this understanding, the Commission considers the following:

- The proposed beneficiaries’ detentions in 2024 were in a context of complete lack of official information on whether there was a court order to justify the detentions or minimal information on the criminal proceedings against them. In addition, it was alleged that the detentions included raids on family residences, or attempts to do so, depending on the situation of each of the proposed beneficiaries’ families.
- There is no official information confirming that the proposed beneficiaries were detained following the issuance of arrest warrants or provided with full details of the criminal charges under investigation. The statements made by the relatives indicate that they had no information whatsoever on their whereabouts in the first hours after their detentions.
- Both proposed beneficiaries are currently deprived of their liberty without the possibility of communicating with their trusted attorneys or receiving visits from their relatives. In this regard, their family members have no official information about their detention conditions or health. As shown by the available information, this situation has worsened over time, with the restriction of informal communication mechanisms that families had been establishing and the isolation of the proposed beneficiaries from other detainees at SEBIN El Helicoide.
- Families are reportedly complying with parcel delivery requirements, including medicines, but are unsure whether they are actually reaching the intended beneficiaries. There is no other

¹⁸ IACHR, Venezuela: Serious Human Rights Violations in connection with the elections, OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

¹⁹ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5.

²⁰ IACHR, [Press Release 72/25](#), IACHR urges Venezuela to immediately release political prisoners and to end the practice of holding them incommunicado, April 11, 2025.

²¹ IACHR, Press Release 72/25, previously cited.

²² IACHR, Press Release 72/25, previously cited.

²³ IACHR, [Press Release 50/25](#), IACHR concludes 192nd Period of Sessions after holding 32 human rights hearings, March 7, 2025.

established channel through state agents by which family members can request formal visits to the proposed beneficiaries.

- The information available reveals the existence of complaints and requests to the Public Prosecutor's Office, SEBIN, and the Ombudsperson's Office with a view to meeting the claims of the families. However, in some cases, the families' documents have not been accepted or processed for a formal response from the relevant state entity.
- The trusted attorneys attempting to represent the proposed beneficiaries have not been accredited in the criminal proceedings to pursue remedies on their behalf. There is reportedly a public defender who has provided limited information to the family, but there is no record of any action taken to ensure that visits to the proposed beneficiaries take place in order to prevent their continued isolation and lack of communication. To the extent that families and proposed beneficiaries depend on this public defender, the Commission understands that there is a situation of defenselessness sustained by the State.
- With regard to gaining access to proposed beneficiaries' criminal records, although certain information was obtained in one case, it was reportedly not possible in the other case. In this regard, the available information reveals that the criminal proceedings were initially confidential, depending on the information that the public defense could share. However, there is no indication that their trusted attorneys can be accredited or that they can assist in any legal defense strategies, given that the proposed beneficiaries continue to depend on a public defender, despite their families' wishes.
- Given the lack of official information, the applicants reported that, to date, it has no evidence to suggest that the proposed beneficiaries are receiving the medical care they require. In fact, the medical reports submitted show that both require ongoing specialized medical care, which there is no record of being provided. In addition, the Commission observes the allegations that suggest that, despite his possible mental health condition, Pedro Guanipa may have been exposed to drug use.
- Given the lack of communication and isolation that the proposed beneficiaries face, along with the difficulties they face in mobilizing internal resources on their behalf, the families are reporting that they are unsure whether the proposed beneficiaries are still alive. The foregoing reportedly reflects a legal uncertainty about their current situations, after being in the custody of the State.

43. In addition to the above, the Commission understands that both proposed beneficiaries were detained as part of the political persecution of the country's opposition following the July 2024 elections. In this regard, the statements issued by Venezuela's Minister of Interior, Justice, and Peace, submitted in the case file, report repeated public accusations against the proposed beneficiaries, linking them to illegal activities due to their support for María Corina Machado²⁴ and Juan Pablo Guanipa,²⁵ current beneficiaries of precautionary measures and leading figures of the opposition in the country during the electoral process. Regarding Pedro Guanipa's case, the Commission also understands that his family unit has been facing risks for years, as shown by the fact that his brother Tomás Guanipa was also granted precautionary measures in 2017.²⁶ Given that the

²⁴ IACHR, [Resolution 89/24](#), Precautionary Measure No. 125-19, María Corina Machado Parisca regarding Venezuela (Follow-up and Modification), November 25, 2024; [Resolution 22/19](#), Precautionary Measures No. 125-19, María Corina Machado Parisca, regarding Venezuela, April 12, 2019.

²⁵ IACHR, [Resolution 71/24](#), Precautionary Measure No. 973-24, Juan Pablo Guanipa Villalobos regarding Venezuela October 7, 2024.

²⁶ IACHR, [Resolution 24/17](#), Precautionary Measure No. 403-17, Julio Borge et al. regarding Venezuela, July 28, 2017 (Available only in Spanish).

proposed beneficiaries were detained last year while they were public officials, one of them elected by popular vote, the Commission warns of the serious impact of their detention. They have been removed from the public and political sphere under harsh conditions that prevent any kind of coordination to protect their rights.

44. Upon requesting information from the State, the Commission regrets its lack of response. Although the foregoing is not enough per se to justify the granting of a precautionary measure, it prevents the Commission from being aware of the observations or measures taken by the State to address the alleged risk that the proposed beneficiaries face. Therefore, the Commission does not have elements that would allow it to dispute the facts alleged by the applicants, nor to assess whether the risk has been addressed or mitigated. In this regard, the Commission expresses its particular concern that State agents, who hold a special responsibility as guarantors of human rights, have been identified as allegedly responsible for the detention of the proposed beneficiaries, who were in their custody.

45. Taking into account the current context of the country, and the previous assessments, the Commission observes that, from the applicable *prima facie* standard, it is sufficiently shown that the proposed beneficiaries face a situation of serious risk to their rights to life, personal integrity, and health in Venezuela.

46. With regard to the requirement of *urgency*, the Commission deems that it has been met given that, should the proposed beneficiaries continue to face the situation described, they are likely to be exposed to a greater impact on their rights. Thus, the IACHR warns that, given their deprivation of liberty, lack of communication with their families, absence of official information on the detention conditions and health, as well as the impossibility of requesting protective measures on their behalf before domestic authorities, there is an imminent risk that this danger will materialize in the current context of the country. In addition, the Commission does not have information from the State to assess the actions that are being taken to address and mitigate the alleged risk faced by the proposed beneficiaries. Therefore, it is necessary to immediately adopt measures to safeguard their rights.

47. Regarding the requirement of *irreparable harm*, the Commission maintains that it has been met, since the potential impact on the rights to life, personal integrity, and health constitutes the maximum situation of irreparability.

IV. BENEFICIARIES

48. The Commission declares as the beneficiaries of the precautionary measures Pedro Miguel Guanipa Villalobos and Rafael Arturo Ramírez Colina, who are duly identified in this proceeding.

V. DECISION

49. The Commission understands that this matter meets *prima facie* the requirements of seriousness, urgency, and irreparable harm set forth in Article 25 of its Rules of Procedure. Consequently, it requests that Venezuela:

- a) adopt the necessary measures to protect the rights to life, personal integrity, and health of the beneficiaries;
- b) implement sufficient measures to ensure that their detention conditions are compatible with applicable international standards. In particular, the following:
 - i. facilitate contact with their family members, representatives, and trusted attorneys, and grant them full access to the judicial file;
 - ii. officially report on the legal situation of the beneficiaries in the framework of the criminal proceedings in which they are allegedly involved; and

iii. immediately carry out a medical assessment of their health, as well as guarantee access to the necessary medical care and treatment;

- c) implement the necessary measures so that the beneficiaries can carry out their activities as opposition political leaders without being subjected to threats, harassment, intimidation or acts of violence;
- d) consult and agree upon the measures to be implemented with the beneficiaries and their representatives; and
- e) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

50. The Commission requests that Venezuela report, within 15 days from the date of notification of this resolution, on the adoption of the requested precautionary measures and update that information periodically.

51. The Commission emphasizes that, pursuant to Article 25(8) of its Rules of Procedure, the granting of precautionary measures and their adoption by the State do not constitute a prejudgment regarding the possible violation of the rights protected in the American Convention and other applicable instruments.

52. The Commission instructs its Executive Secretariat to notify this resolution to the State of Venezuela and the requesting party.

53. Approved on August 15, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary