

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 61/2025**

Precautionary Measure No. 1084-25

**Albany Milagros Colmenares Mendoza regarding Venezuela**

August 24, 2025

Original: Spanish

**I. INTRODUCTION**

1. On July 31, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received a request for precautionary measures filed by *Coalición por los Derechos Humanos y la Democracia* (“the applicants” or “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 Albany Milagros Colmenares Mendoza (“the proposed beneficiary”). According to the request, the proposed beneficiary is the political secretary of the *Vente Venezuela* movement in the state of Carabobo. She was reportedly detained by state agents on July 23, 2025. Since then, she has been kept in solitary confinement, incommunicado, and there has been no official information on her location or detention conditions.

2. The Commission requested additional information from the applicants on August 1, 2025. The applicants provided their response on August 10 and 13, 2025. Pursuant to Article 25 (5) of its Rules of Procedure, the Commission requested information from the State on August 14, 2025. To date, the State has responded, and the granted deadline has expired.

3. Upon analyzing the submissions of fact and law furnished by the requesting party, the Commission recognizes that the beneficiary is in a serious and urgent situation, given that her rights to life and personal integrity 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 and personal integrity of Albany Milagros Colmenares Mendoza; b) implement sufficient measures to ensure that the beneficiary’s detention conditions are compatible with applicable international standards. In particular, the following: i. facilitate contact with their family members, representatives, and trusted attorneys, and give them full access to the judicial file; and ii. officially report on the beneficiary’s place of detention, the legal situation in the framework of the criminal process in which she is allegedly involved, and whether she has been presented to a court for review of her detention; c) implement the necessary measures so that the beneficiary can carry out her political activities, without being subjected to threats, harassment, intimidation, or acts of violence; d) consult and agree upon the measures to be implemented with the beneficiary and her representatives; and e) report on the actions taken to investigate the alleged events that led to this resolution, so as to prevent such events from reoccurring.

**II. SUMMARY OF FACTS AND ARGUMENTS**

**A. Information provided by the requesting party**

4. According to the request, Albany Milagros Colmenares Mendoza is the political secretary of the *Vente Venezuela* movement in the state of Carabobo, which is led by María Corina Machado. As a result of her work in opposing the current government, the proposed beneficiary had reportedly been subjected to systematic surveillance and harassment by state security agents. For example, on July 30, 2024, individuals dressed in black and without identification entered the proposed beneficiary’s residence, assaulted her father, tied him up, entered the rooms, and took the security cameras and her sister’s phone. The proposed beneficiary was not at the residence at the time of the events. In addition, the request reported that agents of the Bolivarian

National Intelligence Service (SEBIN) were keeping constant surveillance near her mother's residence. As a result, the proposed beneficiary had to operate from, what the applicants described as, "clandestinity".

5. During the night of July 23, 2025, state security agents dressed in black broke into the proposed beneficiary's residence and detained her without a warrant. The request warns that she was reportedly detained to punish her for her position as political secretary of a movement identified by the State as "terrorist." After being detained, she was allegedly a victim of a short, enforced disappearance. Her family members last had contact with her before she was detained.

6. On July 25, 2025, her family members heard that she might be at the headquarters of the Bolivarian National Police in the municipality of Los Guayos in the state of Carabobo. However, despite the fact that her relatives have visited the location, they have been unable to confirm if she is being held there. Prison officials also reportedly did not provide information in this regard. It was reported that, to date, she remains incommunicado from her family and attorney, under solitary confinement and with no information regarding her current health. The applicants state that this situation constitutes cruel and inhuman treatment.

7. On August 1, 2025, the proposed beneficiary's defense allegedly attempted to file the following complaints and actions on her behalf: i) *habeas corpus* action before the Criminal Judicial Circuit of the state of Carabobo; (ii) complaint of enforced disappearance and arbitrary detention before the Ombudsperson's Office; and (iii) complaint of enforced disappearance and arbitrary detention before the Carabobo State Prosecutor's Office. However, the applicants revealed that they have not been allowed to file any appeal, since the officials allege that their private defense "has no legitimacy". According to unofficial information, the justice system allegedly designated the proposed beneficiary a public defender against her will.

#### **B. Response from the State**

8. The Commission requested information from the State on August 14, 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**

9. 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.

10. 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.<sup>1</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>2</sup> To do this, the IACHR shall assess the problem raised, the effectiveness of State actions to address the situation, and how vulnerable the proposed

---

<sup>1</sup> 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.

<sup>2</sup> 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).

beneficiaries would be left in case the measures are not adopted.<sup>3</sup> As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. 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.<sup>4</sup> 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.

11. 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.<sup>5</sup> Similarly, the Commission recalls that, by its own mandate, it is not within 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.<sup>6</sup> 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.<sup>7</sup>

12. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,<sup>8</sup> 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.

<sup>3</sup> 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).

<sup>4</sup> 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).

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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).

<sup>8</sup> IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, para. 1.

13. 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.<sup>9</sup> 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.<sup>10</sup> On 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,<sup>11</sup> while using “terror as a tool of social control.”<sup>12</sup>

14. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.<sup>13</sup> The IACHR identified that relatives have not yet received a formal communication about the detention center where their loved ones are held.<sup>14</sup> 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 request that they bring medicine or collect dirty clothes for washing.<sup>15</sup>

15. During its 192nd session, 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.<sup>16</sup>

16. Consequently, the Commission understands that the circumstances in which the proposed beneficiary has been detained, along with the country contextual monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements.

17. With regard to the requirement of *seriousness*, the Commission considers that it has been met. Upon analyzing the proposed beneficiary’s situation, the Commission observes that she was detained in the context described above and identifies the following:

- a. The proposed beneficiary worked as political secretary for the *Vente Venezuela* movement, which was led by María Corina Machado,<sup>17</sup> current beneficiary of precautionary measures granted by the Commission and a leading figure in the opposition during the electoral process. Furthermore, according to public information, the proposed beneficiary had made posts on social media in support of Edmundo González’s candidacy during the electoral process.<sup>18</sup>
- b. There are previous incidents of surveillance, monitoring, and raids by state agents against the proposed beneficiary. For example, on July 30, 2024, she publicly denounced: “For

<sup>9</sup> IACHR, [Press Release No. 184/24](#), IACHR and SRFoE condemn State terrorism practices in Venezuela, August 15, 2024.

<sup>10</sup> IACHR, Press Release No. 184/24, previously cited.

<sup>11</sup> IACHR, Venezuela: Serious Human Rights Violations in the connection with the Elections, OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

<sup>12</sup> IACHR, Venezuela: Serious Human Rights Violations in the connection with the Elections, previously cited, para. 5.

<sup>13</sup> IACHR, [Press Release No. 72/25](#), IACHR urges Venezuela to immediately release political prisoners and to end the practice of holding them incommunicado, April 11, 2025.

<sup>14</sup> IACHR, Press Release No. 72/25, previously cited.

<sup>15</sup> IACHR, Press Release No. 72/25, previously cited.

<sup>16</sup> IACHR, [Press Release No. 50/25](#), IACHR concludes 192nd Period of Sessions after holding 32 human rights hearings, March 7, 2025.

<sup>17</sup> 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 (Available only in Spanish).

<sup>18</sup> I am Alby!, [Alby\_Colmenares], (July 30, 2024), The call will continue to be to stay on the electoral path and demonstrate with minutes in hand that Edmundo González Urrutia is the new president of all Venezuelans [Tweet originally in Spanish], [https://x.com/Alby\\_Colmenares/status/1818303026005958840](https://x.com/Alby_Colmenares/status/1818303026005958840).

approximately two months, Sebin officials have been besieging my house. They patrolled the area, loitered, got out of their vehicles, and took photos of my residence and cars.”<sup>19</sup> In addition, she revealed that, in 2024, unidentified individuals entered her residence, assaulted her father, tied him up, and took the security cameras and her sister’s phone. This shows that, since at least the past year, she had been under close surveillance to locate her whereabouts, which prompted her to seek protection by her own means.

- c. When she was detained on July 23, 2025, state agents broke into her residence, allegedly without a warrant. Since that date, the proposed beneficiary has been kept in solitary confinement, incommunicado, and there has been no information on the detention conditions or her current health.
- d. Her family members have not received any official response regarding her place of detention, as state officials have refused to confirm this information, despite the fact that they knew she was being held at the headquarters of the Bolivarian National Police in the municipality of Los Guayos in Carabobo state.
- e. According to the available information, there are no domestic possibilities to seek protection in favor of the proposed beneficiary given that the national authorities have reportedly prevented her private defense from filing complaints and a writ of *habeas corpus*, alleging that she “has no legitimacy.” Nor is there any information that the public defender appointed by the State has filed any appeal or taken any action to address the proposed beneficiary’s situation.

18. In addition to the above, the Commission observes that the last communication that the family members had with the proposed beneficiary was before she was detained was on July 23, 2025, that is, nearly one month ago. Given this situation, the Commission considers that the proposed beneficiary is reportedly completely vulnerable in relation to the situations she may be currently facing in the custody of the State. In this regard, the Commission recalls that the Inter-American Court has indicated, in the *Matter of Juan Sebastián Chamorro et al. v. Nicaragua*, that “detention without communication not only makes it impossible to verify the current situation of the proposed beneficiaries, their conditions of detention, and their health status, but it also implies a curtailment of the procedural guarantees of all detainees.”<sup>20</sup>

19. 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 does prevent the Commission from being aware of the observations or measures taken by the State to address the alleged situation of risk that the proposed beneficiary faces. 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 which the proposed beneficiary faces have been addressed or mitigated. In this regard, the Commission expresses its particular concern given that State agents, who hold a special responsibility as guarantors, have been identified as being allegedly responsible for the detention of the proposed beneficiary’s human rights, given that they have her in their custody.

20. 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 beneficiary faces a situation of serious risk to her rights to life and personal integrity in Venezuela.

<sup>19</sup> I am Alby!, [Alby\_Colmenares], (July 30, 2024). For approximately two months, Sebin officials have been besieging my house. They patrolled the area, loitered, and got out of their vehicles [Tweet originally in Spanish], [https://x.com/Alby\\_Colmenares/status/1818303026005958840](https://x.com/Alby_Colmenares/status/1818303026005958840).

<sup>20</sup> I/A Court H.R., *Matter of Juan Sebastián Chamorro et al. regarding Nicaragua*, Provisional Measures, Resolution of June 24, 2021, paragraph 36.



21. As for the *urgency* requirement, the Commission considers it to be met, since, if the situation described were to continue, the proposed beneficiary is likely to be exposed to a greater impact on her rights. Thus, the IACHR warns that, given her deprivation of liberty, lack of communication with her family, absence of official information on her detention conditions and health, as well as the impossibility of requesting protective measures on her behalf before domestic authorities, there is an imminent risk that this danger will materialize in the current context of the country. Additionally, the Commission has not received any response from the State regarding the actions that may be taken to address or mitigate the risk faced by the proposed beneficiary. Therefore, it is necessary to immediately adopt measures to safeguard her rights to life and personal integrity.

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

#### **IV. BENEFICIARY**

23. The Commission declares Albany Milagros Colmenares Mendoza, who is duly identified in this proceeding, to be the beneficiary of the precautionary measures.

#### **V. DECISION**

24. 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 and personal integrity of Albany Milagros Colmenares Mendoza.
- b) implement sufficient measures to ensure that the beneficiary's detention conditions are compatible with applicable international standards. In particular, the following: i. facilitate contact with their family members, representatives, and trusted attorneys, and give them full access to the judicial file; and ii. officially report on the beneficiary's place of detention, the legal situation in the framework of the criminal process in which she is allegedly involved, and whether she has been presented to a court for review of her detention.
- c) implement the necessary measures so that the beneficiary can carry out her political activities, without being subjected to threats, harassment, intimidation, or acts of violence.
- d) consult and agree upon the measures to be implemented with the beneficiary and her representatives; and
- e) report on the actions taken to investigate the alleged events that led to this resolution, so as to prevent such events from reoccurring.

25. 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.

26. 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.

---

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

28. Approved on August 24, 2025, by: José Luis Caballero Ochoa, President; Andrea Pochak, First Vice President; Arif Bulkan, Second Vice President; Edgar Stuardo Ralón Orellana; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.