

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 62/2025**

Precautionary Measure No. 906-25

Rory Daniel Branker regarding Venezuela

August 29, 2025

Original: Spanish

I. INTRODUCTION

1. On July 5, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission”, “the Commission” or “the IACHR”) received a request for precautionary measures urging it to request that the Bolivarian Republic of Venezuela (the “State” or “Venezuela”) adopt the necessary measures to protect the rights of Rory Daniel Branker (“the proposed beneficiary”). According to the request, the proposed beneficiary is a journalist and editor of the *La Patilla* website. State agents detained him on February 20, 2025 and, since then, his whereabouts have remained unknown.

2. The Commission requested additional information from the applicants on July 8, 2025, and received a response on July 13, 2025. The IACHR requested additional information from the applicants on August 1, 2025 and received its report on August 6 and 17, 2025. Pursuant to the provisions of Article 25(5) of its Rules of Procedure and the Inter-American Convention on Forced Disappearance of Persons, the Commission requested information from the State on August 21, 2025. To date, the State has not 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 his rights to life and personal integrity are at risk of irreparable harm. Therefore, pursuant to the provisions of 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 Rory Daniel Branker. In particular: i. report whether the beneficiary is in the custody of the State and, if so, indicate the reason and circumstances of his detention; or, the measures taken to determine his whereabouts or fate; ii. if the beneficiary is in the custody of the State, indicate whether he has been charged with crimes and whether he has been brought before a competent court to review his detention, if so, expressly mention the court that hears his criminal case, if he has not appeared before a court; clarify the reason why he has not done so; iii. facilitate the beneficiary’s communication with his family, representatives, and trusted attorneys, and give them full access to his judicial file, if any. b) implement the necessary measures so that the beneficiary can carry out his journalistic activities without being subjected to threats, harassment, intimidation, or acts of violence; and c) 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.

II. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. According to the request, Rory Daniel Branker is a journalist and editor of the *La Patilla* website. It was reported that on February 20, 2025, at around 5:30 p.m., the proposed beneficiary and his partner were on their way to the Italian-Venezuelan Center in Caracas. However, as they were traveling through the Macaracuay neighborhood in the municipality of Sucre, they were intercepted by two armed men dressed in civilian clothes who were traveling on a motorcycle. The individuals allegedly requested the individuals’ identification, and after verifying the proposed beneficiary’s identity, informed him that he was detained, but failed to present an arrest warrant. One of the men seized the proposed beneficiary’s vehicle, forcing him and his partner inside the car, as another individual followed on a motorcycle. They headed to the intersection of

Plaza Venezuela, in the Libertador municipality, where another car was waiting for them. At that point, the proposed beneficiary was separated from his partner and forced to board another vehicle. The request stated that the partner was threatened with the message that: “if she said anything or reported it, she would be putting Rory’s life at risk.” The subjects verbally stated that they were going to take the proposed beneficiary to El Helicoide, headquarters of the Bolivarian National Intelligence Service (SEBIN). However, the applicants stated that no one was able to confirm his arrival or presence at this location. His vehicle has not been found either.

5. From that moment on, there has been no information on the whereabouts of the proposed beneficiary, his health, legal status, or formal record of his detention. The request therefore classified his situation as an “enforced disappearance.” The applicants stated that, in the period prior to his disappearance, there had been at least 20 instances of arbitrary arrests against journalists and activists critical of the Venezuelan regime.

6. On the same day the proposed beneficiary was detained, several men dressed in civilian clothes entered his residence. It was revealed that they had the proposed beneficiary’s personal keys and entered without a search warrant. At the time, his mother (a senior citizen over 78 years of age), and his partner were at the residence. The men took three phones and three computers, despite not showing any legal justification or documentation. In addition, they allegedly threatened the proposed beneficiary’s partner and told her that “if she wants to be free and live in peace, she should leave the house or better yet, the country.”

7. The applicants reported that family members and close friends have taken multiple steps to search for him and have pursued domestic legal remedies with the aim of locating him and protecting his life and personal integrity. In this regard, a calendar was attached detailing the activities carried out on various dates, from February to July 2025.¹ In particular, regarding search efforts, it was reported that family members and friends made in-person visits to the Criminal Investigations Directorate in Maripérez, El Helicoide, SEBIN headquarters in Plaza Venezuela, Zone 7 in Boleíta, the General Directorate of Military Counterintelligence, and El Rodeo Penitentiary. However, it was noted that none of these locations provided information on the proposed beneficiary’s whereabouts or allowed confirmation of his presence.

8. It was reported that the proposed beneficiary’s partner undertook the following actions: (i) on February 21, 2025, she filed a complaint with the Office of the Attorney General reporting the proposed beneficiary’s disappearance; (ii) on February 25, 2025, she attempted to file a writ of habeas corpus, which was not accepted on the grounds that “it is a very long procedure” and that several days would be required because “the bosses of the bosses” needed to review it; (iii) on April 7, 2025, she again attempted to file a writ of habeas corpus, and although received, was left in a state of “verification,” without any acknowledgment of receipt being issued; (iv) on May 21, 2025, she submitted another complaint to the Office of the Attorney General, stressing both the prolonged lack of information regarding the proposed beneficiary’s whereabouts and the vulnerable condition of his mother, who was reportedly experiencing depression and anxiety due to her son’s disappearance; and (v) on May 23, 2025, she delivered a letter to the Ombudsperson’s Office urgently requesting that the proposed beneficiary’s location be determined, and also requested the protection of his fundamental rights.

9. However, the request noted that the complaints and writ of *habeas corpus* remain unanswered, and none of these efforts have yielded any information on the proposed beneficiary’s current location. In addition, the authorities allegedly refused to provide even minimal information, including the identity of any appointed defense counsel, which was not disclosed.

10. In this context, the request stated that on February 26, 2025, the Minister of the Interior, Justice, and Peace, Diosdado Cabello, had stated on the television program “Con el Mazo Dando” that the

¹ The proposed beneficiary’s family members visited various prisons on February 21 and 22; March 12, 13, 15, 16, 17, 19, 23, 24, 27 and 29; April 3, 4, 5, 8, 11, 15, 21, 23, 24, 25, and 30; May 1, 3, 5, 7, 9, 11, 12, 16, 20, 21, 24, 27, 28, and 31; June 3, 4, 9, 10, 22, 23 and 26; July 1, 2, 6, 7 and 12, 2025. They appeared at one or several of these centers each day, in line with the daily schedule.

proposed beneficiary was in custody and would reportedly be charged with “extorting people by publishing false information and other crimes,” but did not mention his current location. Similarly, on May 15, 2025, the same minister publicly stated that the proposed beneficiary was “singing like Pavarotti,” presumably referring to alleged forced confessions. The applicants mentioned that these statements reinforce fears that he is being subjected to torture or cruel treatment, and heighten concerns for his life and personal integrity.

B. Response from the State

11. The Commission requested information from the State on August 21, 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

12. 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.

13. 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.² Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.³ 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.⁴ 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.⁵ In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

² 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.

³ 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).

⁴ 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).

⁵ 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).

- 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.

14. 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.⁶ 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.⁷ 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 carried out without making any determination on the merits.⁸

15. By the same token, in understanding the facts alleged by the applicants, the Commission observes that the Inter-American Convention on Forced Disappearance of Persons, to which the State of Venezuela has been annexed since its ratification on July 6, 1998⁹ considers forced disappearance “[...] the act depriving a person or persons of his or their freedom, in whatever way, perpetrated by agents of the state or by persons or groups of persons acting with the authorization, support, or acquiescence of the state, followed by an absence of information or a refusal to acknowledge that deprivation of freedom or to give information on the whereabouts of that person, thereby impeding his or her recourse to the applicable legal remedies and procedural guarantees.”¹⁰ In addition, the Inter-American Commission highlights what was established by the United Nations Working Group on Enforced or Involuntary Disappearances, in the sense that “there is no minimum time, however short, to consider that an enforced disappearance has occurred.”¹¹

16. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,¹² 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, Special Follow-up Mechanism for Venezuela, known as MESEVE for its acronym in Spanish. In its 2021 Annual Report, the Commission stated that temporary forced disappearances have been systematically practiced in Venezuela, mainly against persons perceived as opponents.¹³ These occur mostly due to the deliberate reluctance of the authorities to report the whereabouts of detained persons, as well as not bringing

⁶ 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.

⁷ 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.

⁸ 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).

⁹ [Inter-American Convention on Forced Disappearance of Persons](#), Belém do Pará, Brazil, June 9, 1994, [Signatories and current status of ratifications of the Inter-American Convention on Forced Disappearance of Persons](#).

¹⁰ [Inter-American Convention on Enforced Disappearance of Persons](#), Belém do Pará, Brazil, June 9, 1994.

¹¹ IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 85; United Nations Human Rights Council, Report of the Working Group on Enforced or Involuntary Disappearances, August 10, 2015, A/HRC/30/38, para. 102.

¹² 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 IACHR, [2021 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 82.

persons before the courts within the legal 48-hour period after detention.¹⁴ In various testimonies collected by the IACHR, there is the suggestion that temporary forced disappearances are a tool of political repression in Venezuela.¹⁵

17. In its 2024 Annual Report, the Commission and the Special Rapporteur for Freedom of Expression (SRFoE, or RELE for its acronym in Spanish) warned of escalating repression against journalists and the media following the July 28, 2024 elections in Venezuela. This context has created a climate of fear among media professionals, who have been forced to restrict their reporting activities.¹⁶ In addition, on August 23, 2024, the SRFoE published a press release alerting the international community to the arbitrary detention of journalists and the criminalization of dissent in Venezuela.¹⁷ With regard to these detentions, the Rapporteur observed that it had received reports concerning the difficulties faced by the relatives of detainees, including challenges in locating them, excessive requirements for visits, and extortion by officials.¹⁸

18. On May 5, 2025, the SRFoE warned of the serious deterioration of the media ecosystem in Venezuela, as well as the growing climate of fear and self-censorship among journalists and citizens seeking to exercise their right to freedom of expression.¹⁹ In this context, the SRFoE expressed concern about the persistence of arbitrary detentions of journalists and media workers in Venezuela, along with stigmatization campaigns and threats from individuals in positions of public authority, particularly from the Office of the President, the Ministry of Interior, Justice, and Peace, and some state governments.²⁰ The SRFoE emphasized that it has received particularly serious reports concerning the enforced disappearance of Rory Branker, whose whereabouts and state of health remain unknown.²¹

19. On August 6, 2025, Commissioner Gloria de Mees, Rapporteur for Venezuela, in the IACHR's Observations to the Permanent Council of the OAS on the human rights situation in Venezuela, highlighted numerous reports of enforced disappearances, arbitrary arrests, and judicial proceedings devoid of due process, measures aimed squarely at silencing journalists for carrying out their work.²² She noted that these actions often originate from State authorities, at both national and local levels. However, the Rapporteur stated that, despite the dangers, many journalists continue their reporting with remarkable resolve, operating in an atmosphere saturated with hostility, censorship, and intimidation.²³ She warned that some journalists have had to adopt security protocols, suspend their work, avoid contentious subjects, relocate internally, or flee the country to protect their lives.²⁴

20. 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.

¹⁴ IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 82.

¹⁵ IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 84.

¹⁶ IACHR, [2024 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 39 rev. 2, March 26, 2025, para. 113.

¹⁷ IACHR, [Press Release 190/24](#), The SRFoE Alerts the International Community about Arbitrary Detention of Journalists and Criminalization of Dissent in Venezuela, August 23, 2024.

¹⁸ IACHR, [Press Release 190/24](#), previously cited.

¹⁹ IACHR, [Press Release 88/25](#), SRFoE warns about the serious deterioration of the media ecosystem in Venezuela and urges the State to respect and guarantee freedom of expression and of the press, May 5, 2025.

²⁰ IACHR, [Press Release 88/25](#), previously cited.

²¹ IACHR, [Press Release 88/25](#), previously cited.

²² IACHR, [Remarks of the IACHR before the OAS Permanent Council on the situation of Human Rights in Venezuela](#), August 6, 2025.

²³ IACHR, [Observations of the IACHR before the Permanent Council of the OAS on the human rights situation in Venezuela](#), previously cited.

²⁴ IACHR, [Observations of the IACHR before the Permanent Council of the OAS on the human rights situation in Venezuela](#), previously cited.

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

- a. The proposed beneficiary is a journalist and editor of the *La Patilla* website, a medium that, according to public information, is known for its critical line of information vis-à-vis the Venezuelan government.²⁵ His work allegedly prompted the Minister of the Interior, Justice, and Peace, Diosdado Cabello, to make public statements against him over several years with a view to questioning his journalistic reports. For example, according to public information, the state authority reportedly indicated the following: “everything you see in *La Patilla* is false”,²⁶ along with expressions such as “now, let’s go against *La Patilla*”.²⁷
- b. Recently, and in the current context of the country, security agents who did not have an arrest warrant detained the proposed beneficiary on February 20, 2025. In addition, the detention also involved threats directed at his partner and his family, as well as state agents raiding his residence. These agents seized communications equipment that belongs to the proposed beneficiary. There is no information available regarding any judicial authority authorizing or supervising these acts.
- c. Since being detained, the Commission notes that approximately eight months have elapsed without any information about the proposed beneficiary’s whereabouts, legal status, health, or formal record of his detention.
- d. This is particularly serious given that, in a television program broadcast on February 26, 2025, the Minister of the Interior, Justice, and Peace publicly stated that the proposed beneficiary is in custody and will be charged with “extorting individuals by publishing false information and other crimes.” On May 15, 2025, the same official referenced alleged confessions by the proposed beneficiary, raising serious concerns regarding the conditions to which he may have been subjected in order to elicit such statements. In this regard, the applicants warned that he could be subject to cruel treatment and torture.
- e. Given the lack of even minimal information about his legal situation, his family and friends carried out multiple search efforts from February to July 2025, visiting the Criminal Investigations Directorate in Maripérez, El Helicoide, the SEBIN headquarters in Plaza Venezuela, Zone 7 in Boleíta, the General Directorate of Military Counterintelligence, and El Rodeo Penitentiary. However, none of these locations were able to confirm the presence of the proposed beneficiary, as the authorities refused to provide any information regarding his whereabouts.
- f. Complaints have been filed and two writs of *habeas corpus* have been attempted: the first was not accepted and the second remains in a state of “verification” to date, with no acknowledgment of receipt or response having been issued. Consequently, there is a lack of internal mechanisms to guarantee the protection of the proposed beneficiary in the absence of information indicating that they are being processed.
- g. None of the Venezuelan authorities have provided any information on the legal situation of the proposed beneficiary in a formal manner. For instance, they have not disclosed his

²⁵ *El País*, [Where is journalist Rory Brakner? Freedom of expression suffers in Maduro's Venezuela](#), April 6, 2025. See also: *La Patilla*, [La Patilla will not change its editorial line](#), May 14, 2015 (Available only in Spanish).

²⁶ *La Patilla*, [Diosdado Cabello: Everything you see in El Nacional, La Patilla or El Pitazo is false](#), November 8, 2018 (Available only in Spanish).

²⁷ *El Nacional*, [Diosdado Cabello: "Ahora vamos por La Patilla"](#), February 10, 2022 (Available only in Spanish).

detention conditions; the specific crime for which he is being investigated; the competent court hearing the case; the criminal file number; whether there are judicial orders for his detention and transfer to a penitentiary; if he has undergone a medical evaluation since his detention; or the exact location where he is currently being held.

22. In this regard, the Commission reiterates that there is no possibility, at the domestic level, of requesting protection on behalf of the proposed beneficiary. His family unit lack even minimal official information about his legal situation, such as an arrest or search warrant, which would allow them to challenge the actions allegedly carried out by state agents before the competent judicial authority. In addition, despite efforts, officials have not provided any information. While this situation persists, the Commission considers that the proposed beneficiary is completely unprotected against the risks he may face since his whereabouts became unknown.

23. In addition to the above, the Commission highlights its concern that the situation of risk described could be intended to intimidate and thereby silence the proposed beneficiary. This would hinder his ability to carry out his work, including his journalistic activities. This directly impacts his right to freedom of expression, which could, in turn, have a discouraging effect on other journalists' and other persons' ability to express themselves freely in the current context in Venezuela.

24. 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 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 that the proposed beneficiary faces has 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 the alleged responsible for the detention of the proposed beneficiary's human rights.

25. Taking into account the current context in the country and previous assessments, the Commission observes that, based on the applicable *prima facie* standard, it has been sufficiently shown that the proposed beneficiary faces a situation of serious risk to his rights to life and personal integrity in Venezuela, given that since his detention on February 20, 2025, his whereabouts, location, or destination remain unknown to date.

26. Regarding the requirement of *urgency*, the Commission finds that it has been met, insofar as the proposed beneficiary's whereabouts remain unknown, and because, with the passage of time, the likelihood of violations of his rights increases. In addition to the above, it has been noted that, despite the search efforts and legal actions undertaken by family members and friends, the domestic authorities have not provided any information regarding his whereabouts or offered even minimal information regarding his state since he was detained. In this context, 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 beneficiary. Therefore, it is necessary to immediately adopt measures to safeguard his rights to life and personal integrity.

27. 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

28. The Commission declares Rory Daniel Branker as the beneficiary of the precautionary measures, who is duly identified in this proceeding.

V. DECISION

29. 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 Rory Daniel Branker. In particular:

- i. report whether the beneficiary is in the custody of the State and, if so, indicate the reason and circumstances of his detention; or, the measures taken to determine his whereabouts or fate;
- ii. if the beneficiary is in the custody of the State, indicate whether he has been charged with crimes and whether he has been brought before a competent court to review his detention, if so, expressly mention the court that hears his criminal case, if he has not appeared before a court; clarify the reason why he has not done so;
- iii. facilitate the beneficiary's communication with his family, representatives, and trusted attorneys, and give them full access to his judicial file, if any.

b) implement the necessary measures so that the beneficiary can carry out his journalistic activities without being subjected to threats, harassment, intimidation, or acts of violence; and

c) 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.

30. 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.

31. 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.

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

33. Approved on August 29, 2025, by: José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Roberta Clarke; Carlos Bernal Pulido; y Gloria Monique de Mees, members of IACHR.