
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUCIÓN 64/2025**

Precautionary Measure No. 225-25

Marbelis Josefina Gibori and Child X.A.M.M. regarding Venezuela

September 15, 2025

Original: Spanish

I. INTRODUCTION

1. On March 3, 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 Tamara Suju (“the requesting party” or “the applicant”) urging the Commission to require that the Bolivarian Republic of Venezuela (the “State” or “Venezuela”) adopt the necessary measures to protect the rights to life and personal integrity of Orlando Moreno Gibori, Marbelis Josefina Gibori, and the child X.A.M.M. (“the proposed beneficiaries”). According to the request, the proposed beneficiaries are being subjected to harassment, siege, and surveillance by state agents. The alleged acts are reportedly carried out with the aim of obtaining information about the whereabouts of Orlando Moreno Gibori, a family member of the proposed beneficiaries, who is considered a political opponent and is believed to be in hiding.

2. Pursuant to Article 25(5) of its Rules of Procedure, the IACHR requested information from the State on August 1, 2025. To date, the State has not replied to the Commission and the granted deadline has expired. For their part, the applicants submitted additional information on March 7, April 15, and June 27, 2025.

3. Upon analyzing the submissions of fact and law furnished by the requesting party, the Commission recognizes that Marbelis Josefina Gibori and the child X.A.M.M. are in a serious and urgent situation, given that their rights to life and personal integrity are at risk of irreparable harm. Therefore, based on Article 25 of its Rules of Procedure, the Commission requests that Venezuela: a) adopt necessary measures to protect the rights to life and personal integrity of Marbelis Josefina Gibori and the child X.A.M.M.; b) implement the necessary measures to ensure that the beneficiaries are not subjected to harassment, surveillance, siege, or other acts of violence; c) consult and agree upon the measures to be adopted with the beneficiaries and their representative; and d) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

II. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the applicant

4. According to the request, Marbelis Josefina Gibori, 56 years old, and X.A.M.M., four years old, are identified as the mother and son, respectively, of Orlando Moreno Gibori. He is reportedly the national coordinator of the Human Rights Committee of the opposition party *Vente Venezuela* and campaign manager for *Comando Con Venezuela* in the state of Delta Amacuro. The applicant alleged that the proposed beneficiaries were being harassed, surveilled, and stalked by state agents in order to locate Orlando Moreno Gibori, who was currently in “hiding,” according to the request.

5. Orlando Moreno Gibori is a human rights defender and activist, as well as an active member of *Vente Venezuela*. He holds multiple positions within the opposition party. Since 2023, and following the opposition primary elections, he had been the victim of persecution, harassment, and intimidation by state security forces due to his role in the *Comando Con Venezuela* campaign. In the context of the 2024 national elections and following candidate María Corina Machado’s campaign tour in the state of Delta Amacuro, he was reportedly

placed under surveillance by vehicles belonging to the Anti-Extortion and Kidnapping Command (*Comando Anti-Extorsión y Secuestro*, CONAS) and the Bolivarian National Intelligence Service (SEBIN). In addition, intelligence officials continuously monitored his activities, and his residence was kept under surveillance by patrols stationed there for hours at a time. In addition, officials from SEBIN and the General Directorate of Military Counterintelligence (DGCIM) infiltrated the meetings of the *Comando Con Venezuela* in Delta Amacuro state in the proposed beneficiary's residence.

6. In June 2024, he was reportedly warned about a possible attack against him. It was alleged that the armed group "Los Pata de Goma" received direct orders to kill him. Consequently, he decided to leave his usual residence and continue working from his shelter. On August 2, 2024, the Second Criminal Court of First Instance of Maturín issued an arrest warrant against him, and he is currently being searched for. That court judgment reportedly prohibited him from leaving the country and holding public office. Since then, he has been living "in hiding," but he continues his work at *Vente Venezuela*, sending communications and conducting video conferences with the families of political prisoners. He fears being detained and becoming a victim of enforced disappearance and cruel treatment.

7. With regard to his mother, Marbelis Josefina Gibori, and his son, X.A.M.M., the request stated that the proposed beneficiaries were being harassed and monitored on a daily basis by SEBIN officials and armed groups in private cars and motorcycles parked in front of their residence.¹ These officials allegedly also organize checkpoints to block access to the residence and also control which individuals visit them often. They reportedly photograph and fly drones over the family residence in the early hours of the morning. It was noted that the drones have allegedly become increasingly "abusive" as they enter the property and even descend to less than one meter within the exterior grounds of the residence. In January and February 2025, armed individuals wearing balaclavas to cover their faces parked their vehicles and pointed out that they had a weapon, which frightened the proposed beneficiaries. Recently, an armed motorcyclist showed the proposed beneficiary Marbelis Josefina Gibori that he had a gun in his waistband and burst out laughing. The incident occurred in front of her sister's residence, which is located near her own home. For her part, she reported that, in recent months, "repressive forces" had offered money and gifts to neighbors who supported the current government in exchange for keeping a constant watch on the proposed beneficiaries' residence.

8. The applicant alleged that Marbelis Josefina Gibori was being visited by unknown individuals, including children, who asked about her son Orlando Moreno Gibori and requested a phone number to contact her "urgently." Visits have reportedly increased for weeks on an almost daily basis. She clarified that after the elections in July 2024, this siege allegedly intensified and is ongoing to this day.

9. The request warned that patrols from the Delta Amacuro state police force reportedly follow the proposed beneficiaries wherever they go, particularly when they leave their residence to run personal errands. It indicated that other family members had been victims of surveillance and intimidation by police officers and armed civilians every time they visited the proposed beneficiaries, with the reported aim of letting them "know that they are being watched." They specified that, recently, Marbelis Gibori and the child X.A.M.M. had gone out to buy food. Two men and a woman dressed in civilian clothes followed them from the moment they left the supermarket and during their journey home. In an attempt to flee, they allegedly stopped at a relative's house for about an hour. However, the officials stayed there and spent the night in the surroundings while attempting to identify the individual who lived in that property. These events restrict the proposed beneficiaries' freedom of movement to the most basic activities, as they fear being detained or disappearing. They add that they have not filed complaints due to the risks posed by state officials themselves.

B. Response from the State

¹ Attached are photographs from surveillance cameras at the proposed beneficiaries' residence.

10. The IACHR requested information from the State on August 1, 2025. To date, no response has been received from Venezuela, and the granted deadline has expired.

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

11. 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.

12. 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 Regarding 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:

- 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.

13. 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

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).

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 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.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 the Rules of Procedure, which can be carried out without making any determination on the merits.⁸

14. As regards the context, the Commission has been monitoring the situation of rule of law and human rights in Venezuela since 2005,⁹ 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 the special follow-up mechanism for the country, known as MESEVE. 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.¹⁰ 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.¹¹

15. In December 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,¹² while using “terror as a tool of social control.”¹³ It also emphasized that, in the months leading up to the 2024 elections, the Venezuelan government intensified its repression of opposition figures or those perceived as such, using security forces to “silence critical voices and neutralize election campaigns.” There was evidence of a pattern of persecution against *Vente Venezuela*, the campaign team of María Corina Machado, who supported candidate Edmundo González Urrutia.¹⁴ In the case of members of *Vente Venezuela*, the arbitrary detentions of 2024 began on January 23, when coordinators in the states of Trujillo, Yaracuy, and Vargas were simultaneously detained by officials from the Bolivarian National Intelligence Service (SEBIN). These detentions were carried out with no warrants and without informing their families of their whereabouts.¹⁵ The detentions continued in April, June and July, targeting both social leaders and members and leaders of the campaign.¹⁶ On January 9, 2025, the Commission urged the State of Venezuela to immediately cease the persecution of opposition figures, human rights defenders, and journalists, and to immediately release all persons detained for political reasons.¹⁷

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

¹⁰ IACHR, Press Release 184/24, IACHR and SRF0E condemn State terrorism practices in Venezuela, August 15, 2024.

¹¹ IACHR, Press Release No. 184/24, previously cited.

¹² IACHR, Venezuela: serious human rights violations in connection with the elections, OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

¹³ IACHR, Venezuela: serious human rights violations in connection with the elections, previously cited, para. 5.

¹⁴ IACHR, Venezuela: serious human rights violations in connection with the elections, previously cited, para. 28.

¹⁵ IACHR, Venezuela: serious human rights violations in connection with the elections, previously cited, para. 31.

¹⁶ IACHR, Venezuela: serious human rights violations in connection with the elections, previously cited, para. 33 and 34.

¹⁷ IACHR, Press Release No. 09/25, The IACHR condemns the ongoing practices of state terrorism in Venezuela and recalls that María Corina Machado is a beneficiary of precautionary measures, January 9, 2025.

16. The Commission understands that the context described is relevant to the analysis of procedural requirements given the family relationship between the proposed beneficiaries and Oscar Moreno Gibori, who is identified as a political opponent in Venezuela. Therefore, insofar as it gives special seriousness to the situation faced in the country today.

17. As for the requirement of *seriousness*, the Commission considers that it has been met. When analyzing the situation that the proposed beneficiaries face, the Commission observes that their current situation has been preceded by situations of risk involving state agents. These acts were allegedly intended to intimidate them into revealing the whereabouts of Oscar Moreno Gibori, who is wanted by a national court and is believed to be in hiding.

18. The Commission understands that, given Oscar Moreno Gibori's involvement and participatory role in the opposition's 2024 election campaign and after being placed in protective custody, his two identified family members reportedly face acts of harassment, surveillance, and continuous monitoring that has intensified over time. The events reportedly took place both at their family residence and when they ventured outside. In this regard, the Commission records the following:

- a. There is alleged daily and constant surveillance, which includes SEBIN officials and armed groups in private cars and motorcycles parked in front of the residence. In turn, these officials allegedly take photographs of them and fly drones over the family residence in the early hours of the morning; the drones even descend to less than a meter within the outside area of the property.
- b. Police officers allegedly set up checkpoints to block access to the residence and control who frequently visits the proposed beneficiaries' residence;
- c. In January and February 2025, armed individuals wearing balaclavas parked in front of the residence and communicated that they were carrying weapons;
- d. In recent months, "repressive forces" have allegedly offered money and gifts to neighbors to keep a constant watch on the proposed beneficiaries' residence;
- e. They receive daily visits by strangers and even children asking about Orlando Moreno Gibori;
- f. Patrols from the Delta Amacuro state police force allegedly constantly monitor the proposed beneficiaries when they leave their residence to run personal errands. It is reported that, on one occasion, they went out to buy food and were followed by two men and a woman dressed in civilian clothes. They decided to stay at a relative's house and the officials stayed in the surrounding area while attempting to find out who lived there.
- g. It is reported that other family members also experience surveillance and intimidation by police officers when they visit the proposed beneficiaries.

19. Considering that the reported events involve the participation of state agents, and therefore could not be reported, the Commission observes the seriousness of the allegations, as they are consistent with the context in which the opposition operates in the country. In this regard, the alleged facts reflect the existence of state persecution against the proposed beneficiaries, due to their relation as Oscar Moreno Gibori's family.

20. In addition, the Commission considers it reasonable to understand that, given the impossibility of carrying out threats, intimidation, direct harassment, or a possible detention against Oscar Moreno Gibori as he is in hiding, his family members have become the primary targets of harm by government security forces or their associates, by virtue of their family relationship. In reaching this determination, the Commission takes into account other precautionary measures granted in favor of relatives of individuals

considered to be political opponents, journalists, and human rights defenders who, given their activities critical of the government or opposition positions, are being subjected to intimidation and threats. For example, in the case of “Relatives of journalist Roberto Deniz Machin,”¹⁸ the Commission considered that the family unit of journalist Deniz was being subjected to attacks and reprisals in response to the investigative work that the journalist continued to carry out from abroad, and that the risk that his relatives faced was intrinsically linked to his work on the *Armando.Info* website. In the case of Sairam Gabriela Rivas Moreno,¹⁹ after making public statements demanding the release of her partner Jesús Alexander Armas Monasterio, a political activist and human rights defender, she was allegedly subjected to threats and harassment by state agents. Similarly, in the case of Aurora Carolina Silva Uzcátegui and her two daughters,²⁰ the Commission learned that they were being harassed and monitored by State officials as a result of public statements made in defense of the rights of so-called “political prisoners” and of her husband, Freddy Francisco Superlano Salinas, an opposition political leader in the country.

21. The Commission believes that the situations that the proposed beneficiaries have faced are concerning and have an element of seriousness, as they have intensified and worsened in recent months, as evidenced by reports of frequent visits from third parties seeking information about Oscar Moreno Gibori. It should also be noted that acts of harassment and intimidation allegedly begin to be replicated in other family members when they interact with the proposed beneficiaries. Therefore, the Commission considers that their situation is likely to worsen, given that Oscar Moreno Gibori remains in hiding and continues his work as national human rights coordinator for *Vente Venezuela*, and continues to release communications and videos with relatives of “political prisoners.”

22. Having requested information from the State under Article 25 of its Rules of Procedure, the Commission regrets the lack of response to the request. Although the foregoing is not sufficient *per se* to justify granting a precautionary measure, the lack of response from the State prevents the Commission from learning about the measures that are purportedly being implemented to address the situation that places the proposed beneficiaries at risk and to dispute the facts alleged by the applicant. Therefore, the Commission does not have information to assess whether the situation that places the proposed beneficiaries at risk has been mitigated. In addition, the allegations make direct reference to the actions of state agents, identified as those directly responsible for the situation of risk that the proposed beneficiaries face.

23. In view of the above, given the acts of harassment, surveillance, and continuous monitoring, the Commission considers that, based on *prima facie* standard and in the current context in Venezuela, the rights to life and personal integrity of the proposed beneficiaries are at serious risk.

24. With regard to the requirement of *urgency*, the Commission highlights that it has been fulfilled, since the facts described suggest that the situation of risk is likely to continue and to be exacerbated over time. The Commission also observes the continued presence of security agents both at the family residence and in social settings, suggesting the possibility that situations presenting a risk may persist and could materialize with greater seriousness. Therefore, measures must be taken to safeguard the rights to life and personal integrity of the proposed beneficiaries so that they can continue to carry out their daily activities freely.

25. Regarding the requirement of *irreparable harm*, the Commission finds it met, given that the potential impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

¹⁸ IACHR, [Resolution No. 14/2020](#), Precautionary Measure No. 1205-19, Relatives of the journalist Roberto Deniz Machin regarding Venezuela, February 5, 2020.

¹⁹ IACHR, [Resolution No. 35/2025](#), Precautionary Measures No. 1426-24, Sairam Gabriela Rivas Moreno regarding Venezuela, April 24, 2025.

²⁰ IACHR, [Resolution No. 38/25](#), Precautionary Measures No. 320-25, Aurora Carolina Silva Uzcátegui and her two daughters regarding Venezuela, May 4, 2025.

26. Lastly, as for *Mr. Oscar Moreno Gibori*, the Commission acknowledges the information sent regarding his situation. However, despite repeated requests for further information, the applicant did not report any specific or recent incidents that would indicate a current or imminent threat against him, given that he is in hiding or “in clandestinity.” In this context, no allegations have been made in this regard, nor has a detailed description been provided of the facts that lead the applicant to believe that his rights to life and personal integrity are at risk. This aspect is relevant according to Article 25 (4) (b) of its Rules of Procedure, which states : “4. Requests for precautionary measures addressed to the Commission shall contain, inter alia: [...] b. a detailed and chronological description of the facts that motivate the request and any other available information.” In this regard, the Commission does not have information that would allow it, at this time, to justify compliance with the procedural requirements in his favor under the terms of Article 25 of the IACHR Rules of Procedure.

IV. BENEFICIARIES

27. The Commission declares *Marbelis Josefina Gibori* and the child *X.A.M.M.*, as the beneficiaries of this proceeding, who are duly identified in this proceeding.

V. DECISION

28. The Inter-American Commission considers 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 necessary measures to protect the rights to life and personal integrity of *Marbelis Josefina Gibori* and the child *X.A.M.M.*;
- b) implement the necessary measures to ensure that the beneficiaries are not subjected to harassment, surveillance, siege, or other acts of violence;
- c) consult and agree upon the measures to be adopted with the beneficiaries and their representative; and
- d) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

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

30. The Commission emphasizes that, in accordance with Article 25(8) of its Rules of Procedure, the granting of this precautionary measure and its adoption by the State do not constitute a prejudgment on any violation of the rights protected under the applicable instruments.

31. The Commission instructs its Executive Secretariat to notify this resolution to the Bolivarian Republic of Venezuela and the requesting party.

32. Approved on September 15, 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.

Tania Reneaum Panszi
Executive Secretary