

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 79/2025**

Precautionary Measures No. 1406-25 and 1414-25
**Nine foreign persons deprived of their liberty
regarding Venezuela**
November 17, 2025
Original: Spanish

I. INTRODUCTION

1. On September 25 and 26, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received two requests for precautionary measures, one of which was filed by the NGO *Foro Penal* (“the applicants”)¹, urging the Commission to request that the Bolivarian Republic of Venezuela (the “State” or “Venezuela”) adopt the necessary measures to protect the rights of: (1) Najam Islam Butt, from Pakistan; (2) Zsuzsanna Bossanyi, from Hungary; (3) Willem Frederik de Rhooes, from the Netherlands; (4) Angelique Brigitte Corneille, from the Netherlands; (5) Miguel Moreno Dapena, from Spain; (6) Walter López Ogaldez, from Honduras; (7) Willy Delano Bowman Webster, from Honduras; (8) Hiubert Johonie Martínez, from Honduras; and (9) Olmedo Javier Núñez Peñalba, from Panama (“the proposed beneficiaries”), from Venezuela. The requests alleged that the foreign nationals were deprived of their liberty in 2025 and are at risk while being held in their current detention conditions, characterized by a lack of information about their legal situation, incommunicado detention, limitations on their ability to secure private defense counsel or access consular assistance, and, in general; a lack of official information about their current situation and health. In all cases, it was alleged that the whereabouts of the individuals were initially unknown after being detained. To date, only Olmedo Javier Núñez Peñalba remains unaccounted for.

2. The Commission requested additional information from the applicants on September 26 and 30, as well as October 1, 3, 6, 14 and 21, 2025. The applicants submitted their communication on September 26, October 1, 6, 16, 21 and 24, and November 6, 2025. Pursuant to Article 25 (5) of the Rules of Procedure and the Inter-American Convention on Forced Disappearance of Persons, as applicable, the Commission requested information from the State on October 15 and 21, 2025. The applicants provided additional information on October 3, 4, 14 and 22, 2025. The State did not respond, and all the granted deadlines have since expired.

3. Upon analyzing the submissions of fact and law furnished by the applicants, the Commission recognizes that the proposed beneficiaries are in a serious and urgent situation, given that their rights to life and personal integrity are at risk of irreparable harm. Therefore, pursuant to Article 25 of its Rules of Procedure, it requests that Venezuela: a) adopt the necessary measures to protect the rights to life and personal integrity of the beneficiaries; b) report whether Olmedo Javier Núñez Peñalba is in the custody of the State and, if so, indicate the place, reason, and circumstances of his detention; or, the measures taken to determine his whereabouts or fate; c) implement sufficient measures to ensure that the detention conditions of the beneficiaries are compatible with applicable international standards. In particular, the following: i. indicate whether they have been charged with crimes and whether they have been brought before a competent court to review their detention, if so, expressly mention the court that would hear their criminal cases, or if they have not appeared before a court, clarify the reason why they have not done so; ii. facilitate the communication of the beneficiaries with their family, representatives, trusted lawyers, and consular authorities of the country of which they are nationals, and give them full access to their judicial records, if any; iii. carry out a health assessment of the beneficiaries, as appropriate, and provide them with the prescribed medical treatment; iv. communicate whether the beneficiaries have been provided, as appropriate, access to a translator or

¹ The IACHR is withholding the identity of the applicant who submitted a request for precautionary measures on behalf of Najam Islam Butt.

interpreter in order to take accurate knowledge of their situation and exercise their rights; v. enable them to have communication with the country of which they are nationals; d) reinforce actions in favor of individuals located in a detention centers covered by inter-American protection previously granted; e) consult and agree upon the measures to be implemented with the beneficiaries and their representatives; and, f) report on the actions taken to investigate the alleged events 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-1406-25 (*Najam Islam Butt*)

4. Najam Islam Butt is a Pakistani citizen. On May 21, 2025, he was staying in a hotel in Caracas, Venezuela. He was reportedly detained by local authorities that same day. Initially, the applicants stated that, as his whereabouts were unknown, and he was reportedly considered to be in a situation of “enforced disappearance.”

5. The request stated that it has not been possible to file a formal complaint or legal action in Venezuela due to the lack of consular access, the absence of legal representation in that country, and the fact that his family’s residence is based in Pakistan. However, it was reported that his family and Pakistani authorities have repeatedly contacted Venezuelan authorities. It was reported that the Embassy of Pakistan in Brazil had sent various diplomatic correspondences and official letters to the Embassy of the Bolivarian Republic of Venezuela requesting information on the whereabouts of the proposed beneficiary, as well as access to him, and consular assistance in his favor. In this regard, three requests for information concerning the whereabouts of the proposed beneficiary, dated June 4, June 20, and July 22, 2025, were attached, along with two requests for consular assistance on his behalf, dated June 20 and June 24, 2025.

6. On August 28, 2025, the applicants filed an official complaint with the *Overseas Pakistani Foundation* (OPF). On August 29, 2025, this institution reported the following:

“(…) Despite repeated reminders, Venezuelan authorities are reluctant to provide substantial information. It is worth noting that a press conference held by the Venezuelan Minister of the Interior, widely circulated on Instagram, featured images of two Pakistani citizens among several other individuals allegedly linked to a terrorist plot. Mr. Najam Islam Butt was identified as one of these individuals at this press conference. An excerpt of this press conference has also been shared with officials from the Venezuelan Ministry of Foreign Affairs for their comments; however, to date, no response has been received. The Mission [OPF] will continue to investigate the case vigorously and will ensure that the detainee’s family is kept informed of all developments.”

7. The applicants indicated that the Pakistan Red Cross is aware of this situation and has provided a case number. Similarly, it was indicated that the case was presented before the United Nations Working Group on Enforced Disappearances.

8. On October 16, 2025, the applicants reported that they had received a call from the proposed beneficiary indicating that he was being held in Rodeo I prison, Venezuela. It was also stated that the proposed beneficiary does not have constant access to adequate medical care, that he has not been able to contact an attorney, that no formal charges or court documents identifying criminal proceedings against him have been presented, and that he has not received any visitors. The applicants noted that the Pakistani Embassy in Brazil has attempted to arrange consular assistance, but has not yet been allowed to visit him. The applicants further noted that they have only limited communication with him.

- ***PM-1414-25 (Eight foreigners who were aboard the ship N35 in international waters near Venezuela)***

9. The individuals who were aboard the ship N35, in international waters near Venezuela, tasked with searching the sea for the remains of ships that sank during World War II, are as follows: Zsuzsanna Bossanyi (Hungarian national), Willem Frederik de Rhodes (Dutch national, captain of the vessel), Angelique Brigitte Corneille (Dutch national, and wife of the captain of the vessel), Miguel Moreno Dapena (Spanish national), Walter López Ogaldez (Honduran national), Willy Delano Bowman Webster (Honduran national), Hiubert Johonie Martínez Martínez (Honduran national), and Olmedo Javier Núñez Peñalba (Panamanian national). The vessel was reportedly intercepted by members of the Bolivarian National Armed Forces on June 13, 2025, and then transferred to the port of Guamache, on Margarita Island, Venezuela. During initial visits by representatives of *Foro Penal* to various detention centers in Venezuela, the authorities failed to confirm whether the identified individuals were being held in those facilities, prompting the organization to classify their cases as instances of “enforced disappearance.”

10. The request showed the statement made by the company that owns the ship N35:

“(…) Faced with the threat of military force, forced detention, and the interruption of crew communications, the captain of the N35 agreed to enter the military port in the Güira area (...) after verification by the authorities on board, it was confirmed that our activity does not violate any international rights under UNCLOS (United Nations Convention on the Law of the Sea). We provided the ship’s documentation and the technical characteristics of our equipment on board (...) Despite the foregoing, Vice Admiral T.F. received orders to take us to the port of Margarita Island by force if necessary (...) The forced act of making us enter a Venezuelan port is intended to send a message to the media against the prospecting and research carried out by Guyana in what the Venezuelan authorities consider to be Venezuela’s Exclusive Economic Zone (...)”.

11. According to the applicants, the Venezuelan Minister of Defense stated that the vessel N35 was conducting scientific activities and oceanographic explorations, allegedly “without permission,” which, according to the applicants, does not justify the detention of the crew members or their indictment as alleged “terrorists.”² The family of Angelique Brigitte Corneille (wife of the ship’s captain Willem Frederik de Rhodes) reported that her last message was sent on June 19, 2025, in which she narrated as follows:

“(…) Our ship was detained in international waters, about 80 miles from Venezuela. We were forced to disembark on Margarita Island, where we stayed for four days. On June 18, we were taken as prisoners. We were first accused of espionage, then terrorism, and now they are transferring us. We don’t understand why”, “all of us have to go with them for an interview. Now I’m starting to get scared. Now they’re taking our phones. “

12. Miguel Moreno Dapena’s mother stated that on July 25, 2025, he managed to speak with her for ten minutes, during which he informed her that he was being accused of “terrorism” and “invading Venezuela’s security zones” by the 67th Prosecutor’s Office of the Public Prosecutor’s Office. He also indicated that the charges had been filed electronically, without his being transferred to a court. From that moment on, there was allegedly no further contact with him.

13. On September 3, 2025, consular representatives from the Netherlands, Spain, and Hungary were able to visit the following proposed beneficiaries: Willem Frederik de Rhodes (Dutch national) in El Rodeo I prison, in the state of Miranda, Venezuela; Miguel Moreno Dapena (Spanish national) in El Rodeo I prison, in the state of Miranda, Venezuela; Angelique Brigitte Corneille (Dutch national) in the “La Crisálida” women’s prison in Miranda state, Venezuela; and Zsuzsanna Bossanyi (Hungarian national) in the “La Crisálida” women’s prison in Miranda state, Venezuela.

² The applicants provided the following references, available only in Spanish: *Analítica*, [Minister Padrino López: Venezuela will not back down in defense of its sea](#), July 25, 2025; *Infobae*, [Venezuelan Armed Forces detain a “gray-painted” vessel searching for sunken World War II ships](#), June 19, 2025; *Defensa*, [The Venezuelan Navy detains the Spanish captain of a treasure-hunting vessel painted gray with military markings](#), June 19, 2025.

14. The applicants warned that these four individuals are depressed due to the limitations on food, hygiene, and sanitary conditions in the detention centers where they are being held. In particular, it was revealed that Angelique Brigitte Corneille and Zsuzsanna Bossanyi remain isolated from the rest of the prison population, in cells in poor condition that only have iron bunk beds, without mattresses. They also allegedly do not have access to drinking water, which reportedly exposes them to stomach illnesses. In addition, the food provided was classified as precarious, based on rice and beans. The request emphasized that the four individuals in question are unaware of the reasons for their detention, as they had not engaged in any criminal activity. The applicants also reported that they have not been permitted to access an attorney of their choice or one appointed by their consular representatives, thereby leaving them without legal defense. It was emphasized that they cannot receive visits from family members, since they are not in Venezuela. In addition, the applicants emphasized that it is unknown whether Willem Frederik de Rhodes, Angelique Brigitte Corneille, and Zsuzsanna Bossanyi have been assisted by an official translator, as they do not speak Spanish. It was noted that, to date, they have not been allowed to communicate effectively with their families or their trusted attorneys.

15. On October 4, 2025, the applicants reported that the Honduran Ambassador to Venezuela visited the facilities of the General Directorate of Military Counterintelligence (DGCIM) in Boleíta, Caracas, with the aim of verifying the physical, emotional, and legal status of three Honduran citizens: Walter López Ogaldez, Willy Delano Bowman Webster, and Hiubert Johonie Martínez Martínez. In this regard, a report was attached on the consular visit by the Honduran Embassy in Venezuela, which stated that the Ambassador was able to directly speak with the three Honduran citizens, who “expressed their concern about the lack of a timely response from the judicial authorities, as well as the absence of legal representation from the moment of their detention.” The report also revealed that, according to official information provided by the Venezuelan authorities in diplomatic correspondence, the three Honduran citizens face charges for committing the following crimes: (i) failure to comply with the special regime governing security zones, (ii) attacks against the independence or integrity of the republic, (iii) criminal association, and (iv) terrorism. However, it was noted that Honduran citizens deny having engaged in such conduct.

16. The applicants stressed that the consular visits were not private, as they were reportedly carried out under supervision and in the presence of custody officials. Therefore, it was alleged that it is not possible to verify whether the proposed beneficiaries are being treated with dignity and respect for their human rights. It was also noted that consular authorities have been unable to conduct further visits.

17. The request highlighted that, to date, the whereabouts of Panamanian citizen Olmedo Javier Núñez Peñalba are unknown, as is any data about the criminal case in which he is allegedly involved, the alleged crimes he is charged with, and it has been stated that he has not been allowed to appoint a defense attorney. In this regard, on October 3, 2025, the applicants sent a communication to the Ministry of Foreign Affairs of the Republic of Panama requesting to be specified of “any additional information on the fate or whereabouts of this detainee, so that it could be communicated to his family members. It is also important to determine whether they have been informed of this person’s detention and whether consular access has been granted.” No response was received to date.

18. The applicants emphasized that, although *Foro Penal* has the express authorization of the relatives of the proposed beneficiaries, the authorities have refused to recognize the appointment of lawyers from that organization to represent the detainees, arguing that the relatives must be physically present in Venezuela. As stated above, this is not possible due to the risk involved in traveling to the country. It was also pointed out that the Public Prosecutor’s Office, the Ombudsperson’s Office and the courts refuse to receive petitions or requests in favor of the detainees under the same reasoning. Consequently, the applicants argued that, given the authorities’ refusal to receive applications, it is impossible to activate mechanisms at the domestic level.

B. Response from the State

19. The Commission requested information from the State on October 15 and 21, 2025, according to the corresponding records. 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

20. 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.

21. 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.³ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.⁴ 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.⁵ 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.⁶ 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

³ 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.

⁴ 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).

⁵ 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).

⁶ 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).

- c. “irreparable harm” refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

22. 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.⁷ 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.⁸ 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.⁹

23. 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, 1998,¹⁰ considers forced disappearance as any form of deprivation of liberty “[...] 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.”¹¹ 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.”¹²

24. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,¹³ 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.

25. 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, while using “terror as a tool of social control.”¹⁴

⁷ 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.

⁸ 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.

⁹ 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).

¹⁰ [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](#).

¹¹ [Inter-American Convention on Enforced Disappearance of Persons](#), Belém do Pará, Brazil, June 9, 1994.

¹² 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.

¹³ IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, para. 1.

¹⁴ IACHR, [Venezuela: Serious Human Rights Violations in Connection with the Elections](#), previously cited, para. 5.

26. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.¹⁵ The IACHR identified that relatives have not yet received a formal communication about the detention center where their loved ones are held.¹⁶ 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.¹⁷ 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.¹⁸

27. Within the above context, the Commission has identified, within the framework of the precautionary measures mechanism, that the State of Venezuela has previously detained foreign nationals in factual circumstances similar to those alleged in this matter. For example, Alireza Akbari, an Irish national;¹⁹ Camilo Castro, a French national;²⁰ Sofia María Sahagún Ortiz, a Venezuelan and Spanish national;²¹ Yevhenii Petrovich Trush, a Ukrainian national;²² Lucas Jonas Hunter, a French and American national;²³ Alberto Trentini, an Italian national;²⁴ Nahuel Agustín Gallo, an Argentine national;²⁵ Arley Danilo Espitia Lara, a Colombian national;²⁶ and Jan Darmovzal, a Czech national.²⁷

28. Based on the information presented in these matters, the Commission observes that there are consistent allegations that provide evidence of a pattern of state action when foreign nationals are detained. In particular, the whereabouts of individuals are reportedly unknown and the authorities refuse to provide information on their situation,²⁸ despite the fact that in some cases state officials publicly announced that they were in state custody and accused them of working for foreign governments or entities.²⁹ There is no certainty about their legal situation, and judicial appeals have been rejected or prevented from being filed. They were also denied the opportunity to appoint private lawyers and access the case files.³⁰ Similarly, in these cases, the consular assistance to which they were entitled as detained foreign nationals was allegedly not guaranteed.³¹ Taken together, these elements reveal that these matters include serious difficulties in activating protective measures and maintaining a state of legal and factual uncertainty surrounding the situation and whereabouts of foreign nationals detained in the current context of the country.

¹⁵ 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.

¹⁶ IACHR, Press Release 72/25, previously cited.

¹⁷ IACHR, Press Release No. 72/25, previously cited.

¹⁸ IACHR, [Press Release No. 50/25](#), IACHR ends the 192nd Period of Sessions with 32 hearings on human rights, March 7, 2025.

¹⁹ IACHR, [Resolution No. 72/25](#), Precautionary Measures No. 1282-25, Alireza Akbari regarding Venezuela, October 8, 2025.

²⁰ IACHR, [Resolution No. 70/25](#), Precautionary Measures No. 1224-25, Camilo Castro regarding Venezuela, October 2, 2025.

²¹ IACHR, [Resolution No. 59/25](#), Precautionary Measures No. 680-25, Sofia María Sahagún Ortiz regarding Venezuela, August 18, 2025.

²² IACHR, [Resolution No. 32/25](#), Precautionary Measures No. 334-25, Yevhenii Petrovich Trush regarding Venezuela, April 5, 2025.

²³ IACHR, [Resolution No. 27/25](#), Precautionary Measures No. 247-25, Lucas Jonas Hunter regarding Venezuela, March 22, 2025.

²⁴ IACHR, [Resolution No. 2/25](#), Precautionary Measures No. 1438-24, Alberto Trentini regarding Venezuela, January 7, 2025.

²⁵ IACHR, [Resolution No. 1/25](#), Precautionary Measures No. 1432-24, Nahuel Agustín Gallo regarding Venezuela, January 1, 2025.

²⁶ IACHR, [Resolution No. 99/24](#), Precautionary Measures No. 1331-24, Arley Danilo Espitia Lara regarding Venezuela, December 16, 2024.

²⁷ IACHR, [Resolution No. 80/24](#), Precautionary Measures No. 1150-24, Jan Darmovzal regarding Venezuela, October 31, 2024.

²⁸ IACHR, [Resolution No. 59/25](#), previously cited; IACHR, [Resolution No. 27/25](#), previously cited; IACHR, [Resolution No. 2/25](#), previously cited.

²⁹ IACHR, [Resolution No. 99/24](#), previously cited; IACHR, [Resolution No. 1/25](#), previously cited; IACHR, [Resolution No. 80/24](#), previously cited.

³⁰ IACHR, [Resolution No. 80/24](#), previously cited; IACHR, [Resolution No. 99/24](#); IACHR, [Resolution No. 1/25](#); IACHR, [Resolution No. 2/25](#) previously cited; IACHR, [Resolution No. 27/25](#), previously cited; IACHR, [Resolution No. 32/25](#), previously cited; IACHR, [Resolution No. 59/25](#), previously cited.

³¹ IACHR, [Resolution No. 80/24](#), previously cited; IACHR, [Resolution No. 99/24](#); IACHR, [Resolution No. 1/25](#); IACHR, [Resolution No. 2/25](#) previously cited; IACHR, [Resolution No. 27/25](#), previously cited; IACHR, [Resolution No. 32/25](#), previously cited; IACHR, [Resolution No. 59/25](#), previously cited.

29. In addition, on March 18, 2025, Marta Valiñas, the Chair of the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela, at the 58th session of the United Nations Human Rights Council, stated that in February 2025, Nicolás Maduro announced that the authorities had detained more than 150 foreign nationals, describing them as “mercenaries,” whose arrests took place mainly in Venezuelan states bordering Colombia, primarily of Colombian and U.S. nationality.³² The Chair of the Mission contextualized the events following the presidential elections of July 28, 2024, observing an intensification of the premeditated and systematic use of arbitrary detentions and unfounded accusations, directed against both Venezuelan citizens and foreign nationals.³³ The Mission found that the authorities had justified these actions against foreign nationals by labeling them as “terrorists” and “international conspirators,” “financed by foreign governments and transnational actors.”³⁴ The Chair of the Mission also mentioned that, in most of these cases, foreign detainees have not been granted access to communicate with a consular office or diplomatic mission of their home state. She noted that the authorities have ignored information requests from consulates and diplomatic missions and that, in some cases, families have also been unable to contact these detainees for several months.³⁵

30. Consequently, the Commission understands that the circumstances surrounding the foreign proposed beneficiaries’ detention, along with the monitoring of the country’s context by the IACHR and other international human rights organizations, are relevant to the analysis of the procedural requirements.

31. With regard to the requirement of *seriousness*, the Commission considers that it has been met. Upon analyzing the situation of the proposed beneficiaries, the Commission understands the following:

- **Najam Islam Butt (Pakistani):** According to the information provided, Najam Islam Butt’s family learned of his whereabouts more than four months after he was detained. In addition, there is no official information on his legal situation, except what the proposed beneficiary was able to communicate to his family via telephone, confirming the place where he was being held. In this regard, data reveals that he does not have consistent access to adequate medical care, has not had contact with an attorney, no formal charges or court documents indicating criminal proceedings against him have been presented, and he has not received any visitors. It was noted that consular authorities have been unable to visit him, despite the efforts made.
- **Willem Frederik de Rhodes (Dutch), Miguel Moreno Dapena (Spanish), Angelique Brigitte Corneille (Dutch), and Zsuzsanna Bossanyi (Hungarian):** Their relatives had been unaware of their whereabouts for at least three months, until September 3, 2025, when consular representatives from the Netherlands, Spain, and Hungary were able to visit them and confirm their places of detention. However, it was revealed that these consular authorities have been unable to make any further visits since that date. These four individuals are reportedly depressed due to the limitations on food, hygiene, and sanitary conditions. In particular, it was reported that Angelique Brigitte Corneille and Zsuzsanna Bossanyi were being held in isolation, in cells in poor condition, with iron bunk beds without mattresses, inadequate food, and no access to drinking water, which exposed them to stomach illnesses. Willem Frederik de Rhodes, Angelique Brigitte Corneille, and Zsuzsanna Bossanyi do not speak Spanish, and it is unknown whether they have had the assistance of an official translator to enable them to understand their legal situation and exercise their right to defense.

³² Office of the High Commissioner for Human Rights, [Declaration of Marta Valiñas, President of the Independent International Mission of Determination on the Bolivarian Republic of Venezuela, at the 58th session of the Human Rights Council](#), March 18, 2025.

³³ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), September 8, 2025, A/HRC/60/CRP.4, para. 142.

³⁴ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 142

³⁵ Office of the High Commissioner for Human Rights, [Declaration of Marta Valiñas, President of the Independent International Mission of Determination on the Bolivarian Republic of Venezuela, at the 58th session of the Human Rights Council](#), previously cited.

- **Walter López Ogaldez, Willy Delano Bowman Webster, and Hiubert Johonie Martínez Martínez (Honduran nationals):** The relatives of the three Honduran citizens had spent nearly four months without knowing their whereabouts, until October 4, 2025, when the Honduran Ambassador was able to meet with the proposed beneficiaries. The proposed beneficiaries complained about the lack of a timely response from the judicial authorities, as well as the absence of legal representation since they were detained. The available documentary evidence reveals that the Honduran ambassador obtained information from Venezuela about the crimes for which the proposed beneficiaries were reportedly deprived of their liberty. The applicants noted that consular authorities have been unable to carry out additional visits, and that the sole visit conducted did not take place under conditions of privacy.
- **Olmedo Javier Núñez Peñalba (Panamanian):** There has been no information on the whereabouts of Panamanian citizen Olmedo Javier Núñez Peñalba since June 13, 2025, that is, for more than four months. The relatives of Olmedo Javier Núñez Peñalba allegedly do not have any information about his situation, such as his location, the charges against him, the case file number, the competent court, the existence of a court order that led to his detention, the conditions of his detention, or whether he has undergone a medical examination.

32. Regarding the rest, the parties alleged that the State had imposed serious limitations on their ability to take domestic action to protect the rights of the proposed beneficiaries, either by failing to provide official information to family members or to the consular and diplomatic authorities involved. In addition, the Public Prosecutor's Office, the Ombudsperson's Office, and the Venezuelan courts reportedly refused to receive petitions or requests presented by *Foro Penal* in favor of the proposed beneficiaries. It was reported that, to date, individuals have been unable to establish effective communication with their relatives or trusted attorneys. They have also not been allowed to appoint an attorney of their choice, despite having the authorization of their relatives.

33. In analyzing the situation of all proposed beneficiaries, the IACHR recalls that the Court has established that holding a detained person incommunicado could constitute treatment contrary to human dignity, given that it can cause extreme psychological and moral suffering for the person deprived of liberty.³⁶ It has also considered that prolonged isolation and incommunicado detention constitute, in themselves, forms of cruel and inhuman treatment.³⁷ The Court has also highlighted that States must ensure that persons deprived of their liberty are able to contact their relatives.³⁸

34. Under the circumstances described above, the Commission finds that the relatives of the proposed beneficiaries have no genuine possibility of pursuing legal action directly in Venezuela, as they are not in the country and are aware of the risks associated with traveling there. This situation leaves the proposed beneficiaries in a state of complete helplessness. Inasmuch as, while this situation persists, the Commission considers that the proposed beneficiaries are completely unprotected against the risks they may be facing in Venezuela.

³⁶ I/A Court H.R. [Case of Espinoza Gonzales v. Peru](#), Preliminary Objections, Merits, Reparations, and Costs, Judgment of November 20, 2014, para. 186; [Case J. v. Peru](#), Judgment of November 27, 2013, considerandum 376; [Cantoral Benavides Vs. Peru](#), Fondo, Serie C No. 69, para. 82; [Case of Suárez Rosero v. Ecuador](#), Judgment of November 12, 1997, Series C No. 35, considerandum 90; [Matter of Guanipa Villalobos](#), Provisional Measures regarding Venezuela, Order of October 15, 2025, para. 41 (Available only in Spanish).

³⁷ I/A Court H.R. [Case of Maritza Urrutia v. Guatemala](#), Merits, Reparations, and Costs, Series C No. 103, para. 87; [Matter of Guanipa Villalobos](#), Provisional Measures regarding Venezuela, previously cited.

³⁸ I/A Court H.R. [Case J. v. Peru](#), previously cited; and [Case of Espinoza Gonzales v. Peru](#), previously cited; [Matter of Guanipa Villalobos](#), Provisional Measures with respect to Venezuela, previously cited; IACHR [Principles and Best Practices on the Protection of Persons Deprived of Liberty in the Americas](#), adopted by the Commission during the 131st regular session, held from March 3 to 14, 2008, Principle XVIII.

35. 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 situation of risk that the proposed beneficiaries face. Therefore, the Commission does not have elements that would allow it to dispute the facts alleged by the requesting party, nor to assess whether the risk that the proposed beneficiaries face has been addressed or mitigated.

36. 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 and personal integrity in Venezuela.

37. Regarding the requirement of *urgency*, the Commission considers that it has been met. Regarding Najam Islam Butt, Zsuzsanna Bossanyi, Willem Frederik de Rhoades, Angelique Brigitte Corneille, Miguel Moreno Dapena, Walter López Ogaldez, Willy Delano Bowman Webster, and Hiubert Johonie Martínez Martínez, the Commission understands that they have been deprived of liberty without effective communication with their families or trusted attorneys, and that they have not had real possibilities of activating internal mechanisms for the protection of their rights in the face of the alleged detention conditions. In the case of Panamanian citizen Olmedo Javier Núñez Peñalba, his whereabouts remain unknown, which means that the passage of time increases the possibility of his rights being violated. The above is concerning as his family members and relatives are unable to activate internal measures to locate him. 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 beneficiaries. Therefore, it is necessary to immediately adopt measures to safeguard her rights to life and personal integrity.

38. 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.

39. In addition, the Commission notes that, according to the information available, Pakistani citizen Najam Islam Butt, Dutch citizen Willem Frederik de Rhoades, and Spanish citizen Miguel Moreno Dapena are being held in El Rodeo I prison in Miranda state, Venezuela. In this regard, the Commission recalls that these individuals are protected as persons deprived of liberty in prison under provisional measures provided for by the Inter-American Court of Human Rights.³⁹ Similarly, it was reported that the three Honduran citizens: Walter López Ogaldez, Willy Delano Bowman Webster, and Hiubert Johonie Martínez Martínez were being held at the headquarters of the General Directorate of Military Counterintelligence (DGCIM) in Boleíta, Caracas, Venezuela. Consequently, these individuals are also beneficiaries of the precautionary measures granted by this Commission on March 21, 2019, as they remain deprived of liberty in that location.⁴⁰

40. Given that the individualized situation of the proposed beneficiaries is located in detention centers covered by inter-American protection measures, the IACHR urges the State of Venezuela to take extreme measures to protect their rights in accordance with the terms of the resolutions in force and in accordance with the provisions of Article 1.1 of the American Convention on Human Rights.

IV. BENEFICIARIES

41. The Commission declares the following persons as the beneficiaries: (1) Najam Islam Butt, (2) Zsuzsanna Bossanyi, (3) Willem Frederik de Rhoades, (4) Angelique Brigitte Corneille, (5) Miguel Moreno

³⁹ I/A Court H.R., [Provisional Measures Regarding the Bolivarian Republic of Venezuela](#), Matters of: Monagas Judicial Prison ("La Pica"); Yare I and Yare II Capital Region Penitentiary Center (Yare Prison); Central Western Region Penitentiary Center (Uribana Prison), and El Rodeo I and El Rodeo II Capital Judicial Prison, Resolution of November 24, 2009 (Available only in Spanish).

⁴⁰ IACHR, [Resolution No. 14/2019](#), Precautionary Measures No. 178-19 Persons (military and civilians) detained in the Directorate General of Military Counterintelligence DGCIM regarding Venezuela March 21, 2019.

Dapena, (6) Walter López Ogaldez, (7) Willy Delano Bowman Webster, (8) Hiubert Johonie Martínez Martínez and (9) Olmedo Javier Núñez Peñalba. These individuals are duly identified in this procedure.

V. DECISION

42. 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 the beneficiaries;
- b) report whether Olmedo Javier Núñez Peñalba is in the custody of the State and, if so, indicate the place, reason, and circumstances of his detention; or, the measures taken to determine his whereabouts or fate;
- c) implement sufficient measures to ensure that the detention conditions of the beneficiaries are compatible with applicable international standards. In particular, the following:
 - i. indicate whether they have been charged with crimes and whether they have been brought before a competent court to review their detention, if so, expressly mention the court that would hear their criminal cases, or if they have not appeared before a court, clarify the reason why they have not done so;
 - ii. facilitate the communication of the beneficiaries with their family, representatives, trusted lawyers, and consular authorities of the country of which they are nationals, and give them full access to their judicial records, if any;
 - iii. carry out a health assessment of the beneficiaries, as appropriate, and provide them with the prescribed medical treatment;
 - iv. communicate whether the beneficiaries have been provided, as appropriate, access to a translator or interpreter in order to take accurate knowledge of their situation and exercise their rights;
 - v. enable them to have communication with the country of which they are nationals;
- d) reinforce actions in favor of individuals located in a detention centers covered by inter-American protection previously granted;
- e) consult and agree upon the measures to be implemented with the beneficiaries and their representatives; and,
- f) report on the actions taken to investigate the alleged events that gave rise to this resolution, so as to prevent such events from reoccurring.

43. 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.

44. 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.

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

46. Approved on November 17, 2025 by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-president; Edgar Stuardo Ralón Orellana, Second Vice-President; Roberta Clarke; Carlos Bernal Pulido; y Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary