

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 80/2025**

Precautionary Measure No. 1314-25

Andrés Felipe Hio Paniagua and Didier Alexander Villegas Soto regarding Colombia¹

November 16, 2025

Original: Spanish

I. INTRODUCTION

1. On September 9, 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 the International Defense Corporation CORPAZ (“the applicants”) urging the Commission to require that the State of Colombia (“the State” or “Colombia”) adopt the necessary measures to protect the rights to life and personal integrity of Andrés Felipe Hio Paniagua and Didier Alexander Villegas Soto (“the proposed beneficiaries”). According to the request, the proposed beneficiaries are at risk due to their work as human rights defenders in territories affected by the presence of criminal groups and due to the exercise of their pastoral duties as bishops. To date, it was indicated that the State has not been able to provide effective protection measures.

2. The Commission requested additional information from the applicants on September 12, 2025. The applicants submitted additional information on September 13 and October 16, 2025. Pursuant to Article 25 (5) of the Rules of Procedure, the IACHR requested information from the State on September 23, 2025, and reiterated the request for information on October 6, 2025. The State provided its report on October 21, 2025.

3. Upon analyzing the submissions of fact and law furnished by the applicants, the Commission believes that the information presented shows *prima facie* 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, the Commission requests that Colombia: a) adopt the necessary measures to protect the rights to life and integrity of Andrés Felipe Hio Paniagua and Didier Alexander Villegas Soto; b) implement the necessary measures so that the beneficiaries can carry out their pastoral and human rights defense work without being subjected to threats, harassment, or other acts of violence; c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; 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.

III. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. The proposed beneficiaries are members of the Ad Gentes Missionary Priestly Fraternity (*Fraternidad Sacerdotal Misionera Ad Gentes*) and the International Defense Corporation CORPAZ (*Corporación Internacional de Defensa*, CORPAZ). Andrés Felipe Hio Paniagua is bishop of the Fraternity and president of CORPAZ. Didier Alexander Villegas Soto is auxiliary bishop of the Fraternity and vice president of CORPAZ.

5. As members of the Fraternity, they are Old Catholic religious leaders, of a non-Roman Catholic tradition, who have been carrying out pastoral, community, and social work with highly vulnerable sectors for more than 15 years. In areas such as Medellín, Urabá, Bajo Cauca, Quindío, among other locations, they reportedly accompany displaced, impoverished communities that are at risk due to the presence of illegal armed groups. Due to the nature of their work, the proposed beneficiaries are allegedly subject to risk and threats. They stated that,

¹ In accordance with Article 17(2) of the Rules of Procedure of the IACHR, Commissioner Carlos Bernal Pulido, a Colombian national, did not participate in the debate and deliberation of this matter.

given their status as religious leaders of the non-Roman Catholic tradition, they are frequently stigmatized and excluded.

6. In the aforementioned context, Hio Paniagua reportedly requested protective measures from the National Protection Unit (UNP) in 2023, which classified his risk level as “ordinary” and rejected the implementation of measures in his favor. According to the request, in July 2025, the proposed beneficiaries submitted new petitions to that body under similar conditions. Among these, Hio submitted a request to the UNP on July 17, 2025. Moreover, the documentation provided includes a response from the UNP dated August 25, 2025, in relation to another request submitted on August 11 of the same year, in which it was reported that there was an active work order in favor of the proposed beneficiary. Additionally, on August 25, 2025, the proposed beneficiaries requested the implementation of a departmental protection detail from the Human Rights and Peace Directorate of the Antioquia Governor’s Office, which initiated the corresponding procedure. In addition, as proof of the foregoing, communications with the Ombudsperson’s Office were attached to the request. The Ombudsperson’s Office held a follow-up meeting regarding the proposed beneficiaries’ situation on August 19, 2025. Moreover, communications from the National Police dated July 19, 2025, were attached in response to requests submitted on July 8 and 15, 2025.

7. In this regard, the proposed beneficiaries stated that on August 28, 2025, following a public intervention in a media outlet in the territory of the Altavista district, “La mano de Dios” sector, in the city of Medellín, they had received a threatening pamphlet signed by a group which call themselves “Los Chivos”. The applicants provided photographic evidence showing a pamphlet stained with what appeared to be traces of blood, along with bullet casings from a firearm. One of these pamphlets urges the proposed beneficiary, Hio, to leave the area, claiming that “his statements will lead him to his grave” and that when they “find him with his mouth full of flies, he will no longer speak”. In addition, another pamphlet, also addressed directly to the proposed beneficiary, reads: “Stop meddling in the affairs of this community that do not concern you.”

8. The documentary evidence supporting the complaint filed with the Office of the Attorney General (FGN) shows that the proposed beneficiaries have publicly questioned an “illegal subdivision of land” attributable to the “Los Chivos” group in the “La mano de Dios” sector of Medellín. In this regard, it is noted that religious leaders are providing support to communities in this sector of Altavista, following a landslide that destroyed homes after heavy rainfall. They state that the Medellín City Council decided to evacuate the homes that were at risk in order to prevent further damage. However, the accused group is allegedly carrying out an ‘illegal subdivision of land’ following these evictions.

9. On September 6, 2025, the proposed beneficiaries allegedly received new threatening pamphlets with explicit death threats. The applicants attached photographs. The following messages can be read: “The priests Hio and Villegas are stirring things up, so the order has been given and we hope that the media will cover the news of the murder of these snitches”; “Wherever our men are, let them see these bastard priests, it’s time for them to see blood”; “Death and sacrifice to the snitches”; “We have already tracked them down and identified the family of Father Jorge and where Father Andrés lives”.

10. In addition to the pamphlets, some of which were left on the vehicle used to transport the proposed beneficiaries, there have also been phone calls by individuals who stated that they are members of the same group, urging the proposed beneficiaries to leave the area and cease their complaints. In this regard, calls were received with threats similar to the content of the pamphlets provided on August 3, 11, 12, and 30, 2025. One of these calls was reportedly made through an interception by an unknown individual, who handed them their phone so they could take the call.

11. In light of these events, on August 28, 2025, the proposed beneficiaries submitted a new emergency protection request to the UNP. However, it is alleged that the UNP refused to implement provisional emergency measures and founded its denial on the risk assessment carried out on the proposed beneficiary Hio in

2023. In this regard, the proposed beneficiaries warn that the State is not taking into account the recent events. In a complementary manner, on August 30, 2025, they filed a formal complaint with the Office of the Attorney General, and simultaneously submitted requests for protection to the Office of the Attorney General's Protection and Assistance Directorate (*Dirección de Protección y Asistencia*, DPA). Regarding this last request, the Commission highlights that it is still being processed and that the DPA has requested a report from the UNP and the activation of measures, which has not occurred to date. On September 2, 2025, the proposed beneficiaries appeared before the Government of Antioquia to request the immediate activation of protection measures. On September 5, 2025, they appeared before the Secretary of Security and Coexistence (*Secretario de Seguridad y Convivencia*) of Medellín. On the same day, the Office of the President of the Republic informed the proposed beneficiaries that the complaints had been forwarded to the Office of the Attorney General.

12. The applicants presented the complaints before various State agencies. The request states that none of these entities has responded. In view of the alleged facts and the reported lack of response from various state agencies, the proposed beneficiaries filed an appeal for protection of constitutional rights (*amparo*). In this regard, on September 9, 2025, the Twenty-Fourth Labor Court of the Medellín Circuit admitted the appeal for protection of constitutional rights (*amparo*) for processing and granted a provisional emergency measure in favor of the proposed beneficiaries:

[...] In this case, after examining the documents submitted, it is noted that the petitioners are leaders of a religious community who have been subjected to threats, [...] Threats to life warrant GRANTING the requested PROVISIONAL MEASURE [...] The NATIONAL PROTECTION UNIT – UNP – and the NATIONAL POLICE are ORDERED TO IMMEDIATELY carry out the initial assessment of the risk to which the plaintiffs are exposed [...] and if necessary activate a protection detail to safeguard the lives of the plaintiffs, in accordance with the framework of their competences and the position held by the plaintiffs [...].

13. Between September 12 and 13, 2025, the UNP reportedly announced the provision of bulletproof vests pending decision by the Committee for Risk Assessment and Recommendation of Measures (CERREM). According to the applicants, the National Police also carried out sporadic patrols and visits to the proposed beneficiaries' residences.

14. However, on October 16, 2025, the proposed beneficiaries stated that the risk assessments that the judiciary ordered to be carried out "immediately" had not yet been carried out. They also state that the provisional measures are insufficient, given that they have required enforced displacement and do not constitute a comprehensive protection detail. In this regard, the applicants believe that it is appropriate to assess the implementation of protected mobility measures, safe accommodation, accompaniment, communications, and, if necessary, security guards or other suitable alternatives. The foregoing considering that they continue to carry out their work in the Altavista region, where the specific events that have been reported took place, and in other regions of the country, without security guards or security guarantees. They report that threatening phone calls, the circulation of intimidating pamphlets, harassment, and constant surveillance by illegal actors, who are aware of their movements and pastoral activities, continue.

B. Response from the State

15. The State expressed to the Commission its commitment and willingness to continue adopting the necessary measures to safeguard the personal integrity of the proposed beneficiaries. It claimed that, through its competent institutions, it is taking the necessary steps to remove the risk factors involved and strengthen existing prevention and protection mechanisms. In order to inform the Commission, it presented reports prepared by the Ombudsperson's Office, the Government of Antioquia, the Municipal Mayor's Office of Medellín, the District Ombudsperson's Office of Medellín, UNP and Office of the Attorney General.

16. The Ombudsperson's Office expressed its firm commitment to monitoring and complying with the necessary actions in view of the possible granting of precautionary measures. It stated that it was aware of the particular situation that the proposed beneficiaries faced, and that it had held a virtual meeting on August 19, 2025. After this meeting, on September 11, 2025, the Ombudsperson's Office requested a risk assessment from the UNP. Additionally, on September 22, 2025, it sent a communication to the Human Rights Directorate of the National Police, requesting accompaniment and prevention measures in favor of the proposed beneficiaries. It also submitted communications to the Directorate of Religious Affairs (*Dirección de Asuntos Religiosos*) of the Ministry of the Interior and to the Specialized Directorate for Human Rights Violations (*Dirección Especializada contra Violencias a los Derechos Humanos*) of the Office of the Attorney General. The following was added:

[...] The case in question shows evidence of threats, harassment, enforced displacement, attempted attacks, and raids, events that are urgent in nature and demand immediate protection by the State for these religious leaders, who, as a result of their pastoral work accompanying the most vulnerable communities, have been victimized by alleged organized armed groups operating outside the law [...].

17. For its part, the Antioquia Governor's Office reported that the Human Rights and Peace Directorate plays a complementary and coordinating role, subject to the decisions of the UNP. In this regard, it mentioned that the UNP reported that the proposed beneficiaries have protection measures in place as an emergency procedure, and the Government is therefore unable to provide additional measures. The Mayor's Office of Medellín stated that it did not have legal authority to assign national or international protection measures, although, in accordance with the principle of shared responsibility, it indicated that it had activated all district mechanisms and referred the case to the authorities who are responsible for adopting protection detail. The Medellín District Attorney's Office reported in a similar manner, stating that it had provided information to the proposed beneficiaries in order to correctly process their requests.

18. In addition, the UNP indicated that it has diligently managed each of the referrals of information and events that placed the proposed beneficiaries at risk, and that the respective risk level assessments have been carried out and are currently ongoing. The UNP provided a spreadsheet with dates and incidents, reporting various requests for protective measures submitted by the proposed beneficiaries, as well as communications sent by other institutions during 2025:

- Regarding the proposed beneficiary Hio, the request states that on July 11, 16, and 21, 2025, he filed for protection with the UNP. In addition, on August 4, 2025, the Advisor of the Citizenship and Community Participation Group (*Asesora del Grupo de Atención a la Ciudadanía y Participación Comunitaria*) requested information on the corresponding processing. Subsequently, on September 3, 2025, the Secretariat of Peace and Human Rights of the Mayor's Office of Medellín sent a new request for "measures". Lastly, on September 5 and 11, 2025, new requests for protection were submitted, but the sender was not identified. Notwithstanding this, it appears from the above information that the request of September 11 was submitted by the Ombudsperson's Office.
- Furthermore, regarding the proposed beneficiary Villegas, communications dated September 2, 2025, were received from the Mayor's Office of Medellín, along with a request for protection measures, with no sender identification. On September 5, 2025, a new communication was received from the Secretariat for Peace and Human Rights of the Mayor's Office of Medellín, and on September 15, 2025, another request was registered (also with no sender identification) along with a communication from the Coordinator of the Legal and Regulatory Management Group (*Coordinador del Grupo Jurídico y Gestión Normativa*) of the Presidency of the Republic of Colombia.

19. The UNP also provided another spreadsheet with dates and incidents, and attached a history of the risk assessments performed on the proposed beneficiaries. The proposed beneficiary, Hio, has three previous risk assessment studies carried out in 2013, 2014, and 2023, in all of which its risk level was assessed as "ordinary".

It was reported that the risk assessment for the year 2025 is currently underway, under Work Order No. 725263 dated July 21, 2025. Consequently, his current risk rating corresponds to the “ordinary” level, according to the assessment conducted in 2023. Regarding the proposed beneficiary Villegas, it is reported that no previous risk assessments have been carried out. However, a risk assessment for the year 2025 is currently underway, under Work Order No. 732348 dated September 5, 2025. Consequently, to date, this beneficiary has not yet received a risk assessment. Regarding both, the following is concluded:

[...] currently the National Protection Unit (UNP) is carrying out the risk level assessment for the proposed beneficiaries. Once this procedure has been completed, a decision will be issued communicating the outcome of the study and, consequently, whether or not material protection measures will be adopted, in accordance with the provisions of the current procedural framework [...].

20. In this regard, the UNP states that, within the framework of the Prevention and Protection Program, the institution implements protective measures only when an “extraordinary” or “extreme” level of risk is determined to exist. In cases where the risk assessment yields an “ordinary” level, the UNP is not required to adopt special individual protection measures. In this regard, the proposed beneficiaries do not have individual protection measures in place.

21. The Office of the Attorney General reported that the facts reported by the proposed beneficiaries are under active investigation by the Special Prosecutor’s Office 42 of the Human Rights Unit of Medellín, attached to the Medellín Sectional Directorate. The Prosecutor’s Office in charge reported that an order had been issued to the judicial police to carry out interviews, examine the scene of the crime, and collect material evidence. On September 12, 2025, an extension of the complaint proceeding was carried out with the proposed beneficiaries. On October 3, 2025, a report was received from the field investigator, which stated that “[...] several neighborhood surveys were conducted to obtain information about the threats [...] with negative results, given that the residents of the area refrained from providing information due to fear and safety concerns.” In addition, it also stated that the proposed beneficiaries have avoided going to the area where the incident took place, and there have therefore been no reports of new threats.

22. It should be added that on September 5, 2025, the 42nd Specialized Prosecutor’s Office of the Medellín Human Rights Unit sent a request for preventive security measures to the commander of the Aburrá Valley Metropolitan Police on behalf of the proposed beneficiaries and the UNP. Moreover, the Prosecutor’s Office requested a risk level assessment before the UNP for both of them, and also requested that they be included in the Office of the Attorney General’s Protection and Assistance Program.

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

23. The precautionary measures mechanism is part of the Commission’s function of overseeing compliance with the human rights obligations set forth in Article 41(b) of the American Convention on Human Rights, also included in Article 18(b) of the Statute of the IACHR. The precautionary measures mechanism is described in Article 25 of the Rules of Procedure of the Commission. 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 people.

24. 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

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.

irreparable harm and 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 described, and how vulnerable the persons proposed as 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.

25. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt. 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 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 its Rules of Procedure, which can be resolved without entering into determinations on the merits.⁸

26. Moreover, when assessing the alleged facts, the Commission takes into account the Colombian *context*. In its Annual Reports for 2021, 2022, 2023, and 2024, the Commission reiterated its concern about the violence resulting from the armed conflict in the country and its particular impact on human rights defenders, social leaders, indigenous peoples, Afro-descendant and farming communities, women, and children and

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).

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).

adolescents.⁹ In particular, in its 2024 Annual Report, the IACHR warned that, despite efforts, high levels of violence persist in the country. As of November 2024, 26 Early Warnings had been issued for 24 departments, 123 municipalities, and 15 non-municipal areas regarding human rights violations linked to the actions of non-state armed groups and their ties to drug trafficking, illegal mining, and deforestation.¹⁰ In this regard, between January and October 2024, the Ombudsperson's Office recorded 147 murders of human rights defenders or leaders, with the departments of Arauca, Cauca, and Valle del Cauca having the highest number of cases.¹¹ The Commission highlighted reports from civil society organizations concerning deficiencies in protection measures. These include material shortcomings in vehicles, bulletproof vests, telephones, and panic buttons; restrictions on protection officers' mobility and fuel supply; lack of institutional presence in the territory; insufficient qualified personnel; and the absence of measures with a gender, ethnic-racial, and territorial focus. These issues have hindered the effective implementation of protection measures.¹²

27. Furthermore, following its on-site visit to Colombia in April 2024, the Commission noted in its Preliminary Observations that the reconfiguration of the armed conflict has led to an alarming number of murders, threats, harassment, and stigmatization, particularly against human rights defenders and social and community leaders, signatories to the Peace Agreement, and journalists.¹³

28. Consequently, the Commission understands that the circumstances that the proposed beneficiaries face, along with the country contextual and thematic monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements.

29. In relation to the requirement of *seriousness*, the Commission considers that it has been met. This is based on the assessment that the proposed beneficiaries carry out human rights advocacy work and act as religious leaders and, as a result, have been the target of multiple attacks against them throughout in 2025. The applicants attribute these facts to criminal groups. The Commission observes that these events have continued to occur over time with particular intensity, including:

- a. explicit death threats that include personal and location information of the proposed beneficiaries (addresses, work areas, identifications, vehicles);
- b. repeated phone calls with threatening content;
- c. repeated distribution of intimidating pamphlets, which included apparent traces of blood and bullet casings;
- d. messages and warnings with explicit language of violence, for example: "your statements will take you to your grave"; "the order has been given and we hope that the media will cover the news of the murder of these snitches"; "Wherever our men are, let them see these bastard priests, it's time for them to see blood"; "death and sacrifice to the snitches"; among others;
- e. Being followed and interceptions on public roads.

30. The Commission understands that the continuity and seriousness of the acts to which the proposed beneficiaries have been subjected reveal the persistence and methods used by non-state actors with a view to preventing them from carrying out their work in defense of human rights, as well as hindering their pastoral and religious tasks. In addition, there are allegations of a lack of response from state entities to various requests for protection measures. In this context, the request stated that both beneficiaries had to seek judicial and constitutional protection to safeguard their rights. As a result, on September 9, 2025, the Twenty-Fourth Labor

⁹ IACHR, 2024 Annual Report, Ch. X. Colombia, OEA/Ser.L/V/II. Doc. 39 rev. 2, March 26, 2025, para. 256, p. 536.

¹⁰ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 263, p. 537.

¹¹ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 266, p. 537.

¹² IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 269, p. 538.

¹³ IACHR, Preliminary Observations, On-site Visit to Colombia, April 15-19, 2024, page 3 (Available only in Spanish).

Court of the Medellín Circuit ordered, as a provisional measure, that the UNP and the National Police immediately carry out risk assessments and, if necessary, implement a security plan.

31. In addition to the above, various state entities, such as the Ombudsperson's Office, have requested information from the UNP regarding the procedure and risk assessment.

32. Although it was indicated that the proposed beneficiaries have protection measures in place by the UNP and the National Police, the protection detail implemented is allegedly operating as provisional measures, derived from a court order, and allegedly are still pending completion of updated risk assessments that address the specific circumstances of their cases. In this regard, it is alleged that these protection measures are ineffective, as they have restricted the proposed beneficiaries' movements and affected their ability to carry out their work in the territory. Contrary to the State's claim that the proposed beneficiaries were no longer working in the area where the events took place, they state that they continue to perform their duties, although they highlight the difficulties they face due to safety concerns. The IACHR considers that the parties' allegations must be evaluated along with the need for protective measures that are relevant and adequate, thereby ensuring that the proposed beneficiaries can continue their pastoral and human-rights defense work without being forced to cease these activities or to leave the territories where they operate.

33. The Commission notes that the UNP reported that, given the current risk assessment of the proposed beneficiaries and in accordance with applicable internal regulations, they are allegedly not being provided with individualized protection measures. Although the IACHR is not called upon to define what specific protection measures should be implemented on behalf of the proposed beneficiaries, the available information reveals that the situation is not being mitigated, and additional timely actions are required on the part of the state institutions as a whole. For example, this Commission observes that more than two months have elapsed since the risk against the proposed beneficiaries reported in this proceeding occurred, and to date, no resolution has been issued by the UNP, nor is there an estimated date for such a resolution. This situation is concerning given that the passage of time without the necessary guarantees increases the likelihood that the reported risk will materialize to the detriment of the proposed beneficiaries' rights.

34. In order to help determine the most appropriate measures, the Commission considers it necessary to promptly and accurately establish their current levels of risk and to adopt protective measures in their favor, taking into account the reported events and their ongoing nature. This assessment should be carried out within the context of their work as human rights defenders and their roles as religious leaders, so as to ensure they can perform their duties safely. Therefore, the Commission warns that, given the nature of the facts indicated, the State must carry out a comprehensive assessment of the risk that the proposed beneficiaries face with a view to identifying the causes of the risk and how to mitigate its effects.

35. In relation to the investigations, the Commission observes that the facts have been reported to the Office of the Attorney General. However, the applicants and the State have stated that there has been no progress in identifying those responsible for the reported facts. Although it was reported that investigative procedures were carried out, the lack of concrete results limits the ability to mitigate risk and perpetuates a context of vulnerability.¹⁴ This information is relevant when assessing the safety of the proposed beneficiaries and the likelihood that the threats, surveillance, harassment, and reported incidents will recur. In this regard, the Commission notes that the Prosecutor's Office stated that, while information was being collected, residents of the area refrained from providing information out of fear and safety concerns.

¹⁴ IACHR, Resolution No. 49/2025, Precautionary Measures No. 262-24, Dumar Eliecer Blanco Ruiz regarding Colombia, July 21, 2025, para. 35.

36. Taking into account the foregoing, the Commission finds that, from the applicable *prima facie* standard, it is sufficiently proved that the rights to life and personal integrity of the proposed beneficiaries are at serious risk.

37. With regard to the requirement of *urgency*, the Commission considers that this has been met, given that the proposed beneficiaries have been the subject of explicit, consistent, and repeated threats, which have not ceased over time. The Commission observes that the proposed beneficiaries still do not receive effective and sufficient protection measures to ensure their safety in the context of their work as defenders and religious leaders. Therefore, given the imminent materialization of the risk and the absence of protection measures effectively implemented, it is necessary to adopt immediate measures to safeguard his rights to life and personal integrity.

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

V. BENEFICIARIES

39. The Commission declares as the beneficiaries of the precautionary measures Andrés Felipe Hio Paniagua and Didier Alexander Villegas Soto, who are duly identified in this proceeding.

VI. DECISION

40. The IACHR 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 Colombia:

- a) adopt the necessary measures to protect the rights to life and integrity of Andrés Felipe Hio Paniagua and Didier Alexander Villegas Soto;
- b) implement the necessary measures so that the beneficiaries can carry out their pastoral and human rights defense work without being subjected to threats, harassment, or other acts of violence;
- c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; 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.

41. The Commission requests that the State of Colombia 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.

42. 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.

43. The Commission instructs its Executive Secretariat to notify this resolution to the State of Colombia and the applicants.

44. Approved on November 16, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan; Edgar Stuardo Ralón Orellana; Roberta Clarke; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary