

## INTER-AMERICAN COMMISSION ON HUMAN RIGHTS RESOLUTION TO LIFT PRECAUTIONARY MEASURES 81/2025

Precautionary Measure No. 490-18  
M.B.B.P.<sup>1</sup> regarding Panama  
November 16, 2025  
Original: Spanish

### I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of M.B.B.P. regarding Panama. At the time of making the decision, the Commission evaluated the actions taken by the State during implementation; which account for a significant change in the beneficiary's legal and factual situation, following the adoption of domestic decisions in her favor. Consequently, the IACHR considered that the requirements of Article 25 of the Rules of Procedure and has decided to lift these precautionary measures.

### II. BACKGROUND INFORMATION

2. On October 15, 2018, the IACHR requested the adoption of precautionary measures in favor of M. B. B. P., in Panama. The request indicated that the beneficiary, a Venezuelan citizen, was in deportation proceedings initiated following the detection that she was living with human immunodeficiency virus (HIV). It was added that the expulsion order placed her at risk since, if she were to be returned to her country of origin, she would face a context of shortages and lack of access to medical care, especially regarding her treatment. Upon analyzing the submissions of fact and law, the IACHR considered that the information presented showed, in principle, that the beneficiary was in a serious and urgent situation. Consequently, in accordance with Article 25 of the IACHR Rules of Procedure, the Commission requested that Panama adopt the necessary measures to guarantee the rights to life, personal integrity, and health of Ms. M.B.B.P. In particular, by refraining from deporting or expelling the beneficiary to Venezuela, until the domestic authorities have duly assessed, in accordance with applicable international standards, the alleged risk faced with respect to her health situation.<sup>2</sup>

3. The representation was initially exercised by the Ombudsperson's Office of Panama and the Human Rights Committee of Panama. Subsequently, the beneficiary authorized Víctor Atencio Gómez and Marlín González, who previously worked in such institutions, to follow up.

### III. INFORMATION PROVIDED DURING THE TIME THESE PRECAUTIONARY MEASURES WERE IN FORCE

#### A. Procedure during the time the measures were in force

4. During the time the precautionary measures were in force, the Commission followed up on the situation by requesting information from the parties. In this regard, communications were received from the parties and sent from the IACHR on the following dates:

| Year | State      | Representation         | IACHR |
|------|------------|------------------------|-------|
| 2018 | October 24 | October 18, November 6 |       |

<sup>1</sup> In view of the nature of the facts alleged in the request and the personal circumstances of the beneficiary, the IACHR keeps her identity confidential. It is noted for the record that the State knows her identity.

<sup>2</sup> IACHR, [Resolution No. 81/2018](#), Precautionary Measure No. 490-18, M.B.B.P. regarding Panama, October 15, 2018.

|      |                                |                                                                                  |                  |
|------|--------------------------------|----------------------------------------------------------------------------------|------------------|
| 2019 | February 8, March 14, April 24 | January 2, February 7, 14, 18, March 27, April 3, 5, 6, 7, 15, May 8, 14, 21, 31 | January 4 and 29 |
| 2020 | No information                 | No information                                                                   | December 10      |
| 2021 | No information                 | January 8                                                                        | July 9           |
| 2022 | No information                 | No information                                                                   | November 11      |
| 2023 | February 10                    | February 9                                                                       |                  |
| 2024 | August 26                      | No information                                                                   | November 11      |
| 2025 | No information                 | No information                                                                   | May 29           |

5. The Commission held a working meeting on February 12, 2019, within the framework of its 171st Period of Sessions. In its reports of February 10, 2023, and August 26, 2024, the State requested that these measures be lifted. These reports have been duly forwarded to the representation for their observations. The representation has not responded to the requests for observations nor have they provided additional information following their communication of February 9, 2023. After having made the corresponding forwarding of information, the IACHR decides to evaluate whether this matter should remain in force.

#### **B. Information provided by the State**

6. On October 24, 2018, the State reported that the National Migration Service (SNM) issued Resolution No. 34,294, of October 19, 2018, through which it annulled the detention of the beneficiary and granted her release with summons, until the Supreme Court of Justice (CSJ) rules on the appeals filed. The State also said that it had called a follow-up meeting for November 1, 2018.

7. On February 8, 2019, the State complemented that a writ of *habeas corpus* before the CSJ was resolved on October 5, 2018, confirming the legality of the detention of the beneficiary in 2018. An amparo of constitutional guarantees was also resolved by the CSJ, determining that “reference to the condition of the amparo applicant who has HIV was unnecessary, as de facto support to order the expulsion and less if this would be done without the due development or explanation of why her disease represents a threat to health.” In relation to the meetings held, it expressed that these took place on November 1 and December 12, 2018. Regarding health, it was reported that the National STI/HIV and Viral Hepatitis Program (PNIVHV) made visits to the migration service shelter where the beneficiary was and, on May 29, 2018, her first appointment took place at the Friendly Clinic of the Health Center of Sana Ana, where she received attention, undertook tests, and was referred to the Antiretroviral Therapy Clinic of the Santo Tomás Hospital (CTARTV). On June 11, 2018, she had an appointment at the CTARTV, where she received an initial medical evaluation and provided samples to perform the baseline analytical scheme. On June 15, 2018, she had a follow-up appointment at the CTARTV, receiving the order to start treatment, which was claimed at the pharmacy. On July 3, 2018, the beneficiary attended a control appointment with nursing and mental health, after the start of antiretroviral treatment. Subsequently, on December 11, 2018, she went to an appointment with her infectious disease doctor and with CTARTV nursing staff, corroborating that she received her antiretroviral treatment with efavirenz/emtricitabine/tenofovir and that her viral load was 40 copies and her CD4+531 cells, “which indicates an excellent response to treatment and adherence by the patient.” According to the applicable standard, the State said that it would be appropriate to have two appointments a year, with withdrawal of medications each month and an open consultation in case of presenting symptoms and another condition. Regarding the immigration status of M. B. B. P., on December 26, 2018, the SNM reported that the humanitarian permit was not viable for the beneficiary, because it would not allow her to work, but that other alternatives would be verified.

8. On March 14, 2019, the State ruled on the allegations of the representation regarding the employment situation of representative Víctor Atencio within the Ombudsperson’s Office. The State clarified that the representative was not subject to any type of pressure and harassment to perform his functions and

added that conciliation meetings have been held on November 1 and December 12, 2018, and on February 20, 2019, being the representation convened and Víctor Atencio participating in the three of them.

9. On April 24, 2019, the State reported that, on February 28, 2019, there was a consultation meeting in which the representation participated. At that meeting, the SNM offered residence visa options to the beneficiary, indicating that the most convenient was the “residence visa as a domestic worker” because it would allow her free transit in the country and seek work until she had a more permanent solution, but the representation did not accept that option. The representation requested the delivery of food, housing, and other needs. According to Panama, on April 1, 2019, a food donation intended for the beneficiary for a period of two months had not yet been collected from the Ombudsperson’s Office. The beneficiary confirmed that she was aware and did not refuse to receive it. The State stated that in its file there was no information on the place of residence or contact of the beneficiary, so they asked for her phone number from the National Office for the Attention of Refugees. Upon contacting the beneficiary, they let her know that Marlín González no longer worked in the Human Rights Committee and Víctor Atencio did not work in the Ombudsperson’s Office, which she said she knew, so they expressed that they fully recognize them as their representatives.

10. On February 10, 2023, the State updated that the Temporary Resident Permit for Humanitarian Reasons was granted to the beneficiary with validity until June 24, 2026, which could be extended for up to six (6) more years, in accordance with Article 174 of Executive Decree 320 of August 8, 2008, consubstantiated by means of Resolution No. 9,305 of June 24, 2020 of the SNM. Within the attached resolution, it is “recommended to offer the applicant the possibility of legalizing her immigration status through a humanitarian measure, because she does not have the requirements or resources to opt for another immigration category.” Consequently, the State requested that the precautionary measures be lifted, considering that there has been a factual modification of the serious, urgent and irreparable circumstances.

11. On August 26, 2024, the State reiterated that the beneficiary received the Temporary Resident Permit for Humanitarian Reasons in force until June 24, 2026. The State added that on September 9, 2020, the National Commission against Human Trafficking identified the beneficiary as a preliminary victim of human trafficking and that, on January 20, 2020, she was identified as a victim of human trafficking in full, ordering measures in her favor. On October 1, 2020, she initiated psychological therapies that culminated on February 1, 2023, during which time she was also provided humanitarian aid, medical assistance, and medication. In relation to his medical situation, the continuity of her treatment was confirmed, specifying that, since 2020, she has the same treatment, without secondary results and tolerating antiretroviral therapy, which at its last result of April 26, 2023, reported undetectable status. The last control at that time was that of February 6, 2024. The State affirmed that the beneficiary is not at risk of deportation given her current status, valid until June 24, 2026, with the possibility of extension; she was recognized as a victim of human trafficking; that she has been under treatment for HIV since 2018; as well as that she has joined the labor economy of Panama. Therefore, it insisted on the lifting of the precautionary measures.

### **C. Information provided by the representation**

12. On October 18, 2018, the representation highlighted the collaboration between the Human Rights Committee of Panama and the Ombudsperson’s Office for the joint presentation of the initial request, with the collaboration and work of civil society. At the same time, on November 6, 2018, it agreed that a meeting had been held with authorities on November 1, 2018, of which they highlighted the willingness of some authorities to comply, but also the persistence of others in a “hostile treatment.” It was added that the Supreme Court of Justice decided, within the framework of a *habeas corpus* filed, that the decision of detention and expulsion of the beneficiary of March 14, 2018, was legal. The representation remarked that inasmuch as the beneficiary had been an applicant for refugee status since March 9, 2018, her detention and expulsion were not appropriate.

13. On January 2, 2019, the representation announced that the SNM was not attending the meetings convened for the implementation of the measures, delaying the definition of the immigration status of M.B.B.P. On February 12, 2019, the representation indicated that, when resolving the protection of guarantees of the Supreme Court of Justice, it was specified that “reference to the condition of the amparo applicant who has HIV is unnecessary, as a matter of fact to order the expulsion and less if this would be done without the due development or explanation of why her disease represents a threat to health,” since “this can be considered as an act of discrimination.” The representation expressed that the beneficiary has no father or mother and has two children, aged 6 and 10, who are still in Venezuela. They added that she moved to Panama because she found work in a bar, providing contextual information on discrimination against women in this area. They pointed out that the State limited itself to releasing the beneficiary, but at four months, she continued without immigration status. Therefore, the beneficiary could not leave her house and move due to the fear of being detained by the National Police because she did not have documents. It was added that she lived in a “psychological state of depression, irritability, persistent sadness, and frequent crying. Thoughts about death, decrease to enjoy their preferred activities, coupled with their fear of leaving due to their immigration status, certified by the psychologist.” They added that she could not work or send money to her aunt who cared for her children in Venezuela, as well as that she survived by donations from organizations. The representation recognized the efforts of the Foreign Ministry in convening meetings with institutions, but questioned the lack of structural progress in the Panamanian State for the medical care of people living with HIV. Arguments were issued related to the employment situation of representative Víctor Atencio Gómez in the Ombudsperson’s Office, denouncing the withdrawal of his functions in the institution. On February 18, 2019, arguments of “workplace harassment” were reiterated against the representative.

14. On March 27, 2019, the representative alleged delay in meeting the commitments of the work meeting of February 12, 2019. On April 3, 2019, they reported that they were having challenges in obtaining food donations for the beneficiary and that they requested a meeting with authorities that had not been granted. On April 5, 2019, they sent a letter that the beneficiary sent to the Ombudsperson, where it is stated that she authorizes the handling of her case only to Marlín González and Víctor Atencio. On April 6, Víctor Atencio Gómez reported his dismissal from the Ombudsperson’s Office. On April 7, 2019, the Ombudsperson’s Office reported that: i) the President of the Republic was seeking the granting of the status of “Special Permanent Resident” to the beneficiary; ii) it was not possible to locate the beneficiary for food delivery; and, iii) on April 5, 2019, the cessation of Víctor Atencio Gómez was decreed.

15. On May 8, 2019, the representatives expressed that the participation of the Ombudsperson’s Office in the procedure was unknown. On May 14, 2019, they requested the Ministry of Foreign Affairs to issue a certification that M.B.B.P. is a beneficiary of precautionary measures of the IACHR. On May 21, 2019, the representation shared the certification issued by the Foreign Ministry and questioned that it only alluded to the impossibility of expulsion or deportation and “not to other extremes.” Similarly, they requested that the State pay the beneficiary’s rent, define her immigration status, grant her a work permit, and reunite her with her children.

16. On January 8, 2021, representative Marlín González summarized the background of the case and submitted contextual data and political considerations in which she considers that it is framed, seeking to punish the responsible persons. Following a change in the Ombudsperson’s Office, this institution has managed: i. Temporary Residence Permit for six years issued by SNM for humanitarian reasons, resolving the migratory status of the beneficiary through Resolution No. 9,305 of June 24, 2020; ii. Communication from the Ministry of Labor and Social Development, at the request of the Deputy Ombudsperson, where the change of situation is welcomed and the work permit application process begins; and, iii. Initiation of process in the Inter-Agency Office against Trafficking in Persons to provide assistance to the beneficiary as a possible victim of trafficking. They added that the beneficiary continued to receive support from other organizations, such as the Living Positively Association and the Norwegian Refugee Council. The representative recognized “significant progress and humane treatment” to the beneficiary and indicated that she lacks a qualification as a victim of trafficking and reunification are her children. The investigation of the facts, restitution of rights, rehabilitation of the victims, guarantees of non-repetition and compensatory compensation were requested.

17. On February 9, 2023, the representative expressed that they continued to consider it concerning that the State seriously violated the rights of the beneficiary due to her HIV-positive health condition, which reportedly led to different human rights violations. For her part, it was reported that the Director of the National Migration Service of Panama signed the family reunification of the beneficiary with her two children, who remained in Venezuela. They pointed out that the beneficiary was working, but that her salary was not enough to support her and her children, which is why the representative supported her with a free living space. She learned that she continued to be enrolled in the PNIVHV and continued to receive periodically her antiretroviral medications and medical care, so her diagnosis was “undetectable,” which reflects that the virus was well controlled and in a condition of “viral suppression.” In addition, it was said that the beneficiary received support from the Ombudsperson’s Office, the Living Positively Association and the Norwegian Refugee Council. They confirmed that her children are with her in Panama and in the process of being enrolled in school and it was added that, due to the provisional status of her visa, she was not sure that she would have the medications if the situation changed.

#### **IV. ANALYSIS OF THE REQUIREMENTS OF SERIOUSNESS, URGENCY, AND IRREPARABLE HARM**

18. The precautionary measures mechanism is part of the Commission’s functions of overseeing compliance with the human rights obligations established 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; while the mechanism of precautionary measures is set forth in Article 25 of the Commission’s Rules of Procedure. In accordance with this Article, the IACHR grants precautionary measures in urgent and serious situations in which these measures are necessary to avoid irreparable harm to persons or to the subject matter of a petition or case before the organs of the inter-American system.

19. The Inter-American Commission and the Inter-American Court of Human Rights (“the Inter-American Court” or “I/A Court H.R.”) have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.<sup>3</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>4</sup> 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.<sup>5</sup> Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under study by the organs of the inter-American system. 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 of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations. In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

<sup>3</sup> I/A Court H.R., [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#), Provisional Measures regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; [Case of Carpio Nicolle et al. v. Guatemala](#), Provisional Measures, Order of July 6, 2009, considerandum 16.

<sup>4</sup> I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; [Matter 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.

<sup>5</sup> I/A Court H.R., [Matter of Milagro Sala](#), Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; [Matter of the Criminal Institute of Plácido de Sá Carvalho](#), Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

- 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.

20. In this sense, Article 25(7) of the Commission’s Rules of Procedure establishes that decisions granting, extending, modifying or lifting precautionary measures shall be adopted through reasoned resolutions. Article 25(9) sets forth that the Commission shall evaluate periodically, at its own initiative or at the request of either party, whether to maintain, modify or lift the precautionary measures in force. In this regard, the Commission shall assess whether the serious and urgent situation and the risk of irreparable harm that caused the adoption of the precautionary measures persist. Furthermore, it shall consider whether there are new situations that may meet the requirements outlined in Article 25 of its Rules of Procedure.

21. Similarly, the Commission recalls that while the assessment of the procedural requirements when adopting precautionary measures is carried out from a *prima facie* standard of review, keeping such measures in force requires a more rigorous evaluation.<sup>6</sup> In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.<sup>7</sup> The Inter-American Court has indicated that the passage of a reasonable period of time without any threats or intimidation, added to the lack of imminent risk, may lead to the lifting of international protection measures.<sup>8</sup>

22. As a *preliminary matter*, the Commission clarifies that in this proceeding it will only refer to the situation presenting a risk considered in the light of Article 25 of its Rules of Procedure. In this regard, it is noted that claims related to labor matters, compensation or reparations exceed the mechanism of precautionary measures and will not be addressed in this proceeding.

23. The Commission notes that the representation has not responded or provided information since February 9, 2023. This is important because there are no observations or updates in the face of the change of circumstances that have been updated by the State, despite the requests for observations of November 11, 2024, and May 29, 2025. In this sense, in the absence of updated information on their part, it is impossible to assess their observations on any situations that may have arisen, which is relevant in the face of the change in legal and factual circumstances, particularly more than two and a half years after the last update on their part.

24. In the instant matter, the precautionary measures were granted on October 15, 2018, in favor of M. B. B. P., due to the risk faced the beneficiary in a deportation procedure initiated as a result of being detected living with HIV, considering the risk if she did not receive the treatment required in her country of origin, Venezuela, where she allegedly faced a context of shortages and lack of access to medical care. The Commission requested that Panama adopt the necessary measures to guarantee the rights to life, personal integrity, and health of Ms. M.B.B.P. In particular, by refraining from deporting or expelling the beneficiary to Venezuela until the domestic authorities have duly assessed, in accordance with applicable international standards, the alleged risk faced with respect to her health situation.<sup>9</sup>

25. Based on the information provided in the case file after the granting of the precautionary measures, the Commission notes the following:

<sup>6</sup> I/A Court H.R., [Case of Fernandez Ortega et al.](#), Provisional Measures regarding Mexico, Order of February 7, 2017, considerandums 16 and 17.

<sup>7</sup> I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

<sup>8</sup> I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

<sup>9</sup> IACHR, [Resolution 90/2024](#), previously cited.

*a. Refrain from deporting or expelling the beneficiary to Venezuela until her health risk is assessed.*

- i. The Commission acknowledges swift action from the Panamanian authorities. Among them, it is noted that, on October 5, 2018, the Supreme Court of Justice determined that the beneficiary's HIV condition was an unnecessary reference "as de facto support to order the expulsion and less if this would be done without the due development or explanation of why her disease represents a threat to health." For its part, on October 19, 2018, four days after the granting, the National Migration Service issued Resolution No. 34,294, annulling the detention of M.B.B.P. It is also relevant that, in May 2019, the Foreign Ministry granted a certification that she was a beneficiary of these precautionary measures, indicating the impossibility of her expulsion or deportation from the country.
- ii. The Commission notes the importance of the aforementioned judicial and administrative decisions, which determined the freedom and ordered the beneficiary not to be expelled or deported, demonstrating immediate actions in the implementation of the precautionary measures.

*b. Adoption of an assessment, in accordance with applicable international standards, of the alleged risk faced with respect to their health situation.*

- i. In addition to what was indicated in the previous paragraph, the IACHR highlights that the State explored the granting of a visa to the beneficiary, making the domestic worker visa available on February 28, 2019, but it was not accepted. On June 24, 2020, the competent entity adopted Resolution 9305 of the SNM, by means of which the Temporary Resident Permit for Humanitarian Reasons was granted to the beneficiary, with a validity of six years, until June 24, 2026, and which has the possibility of being extended.
- ii. In light of the information available, the IACHR understands that the State assessed, at the time of granting the visa for humanitarian reasons, that the beneficiary required international protection. In accordance with the foregoing, the decision of the CSJ of October 5, 2018, by means of which the undue basis of the expulsion was expressed based on the health condition of the beneficiary, is transcendent.
- iii. The IACHR notes that the protection provided is currently in force and the SNM resolution highlighted the possibility that the beneficiary can legalize her immigration status through a humanitarian measure, so there are alternatives and resources available internally prior to the expiration of the temporary resident permit. The Commission also appreciates that the State extended protection to the beneficiary's children, who, as confirmed by both parties, are already with her in Panama.

*c. Protection of the life, personal integrity, and health of the beneficiary.*

- i. According to the updates sent by the parties, M. B. B. P. has been receiving medical attention since 2018, the year in which she was treated at the shelter and referred in June to the CTARTV, where she began receiving her antiretroviral treatment and a prompt response to it was observed, decreasing her viral load. In this way, the monthly withdrawal of medications was arranged, two annual consultations and open consultation if required, pointing out in the most recent information, coinciding from both the State and the representation, which by 2023 already reported "viral suppression" or "undetectable state" of the virus.
- ii. The IACHR also notes that the National Commission against Human Trafficking identified the beneficiary as a victim of human trafficking in January 2020, ordering measures in her favor, including psychological therapies from October 2020 to February 2023, humanitarian aid, medical assistance, and medication.

- iii. For the IACHR, the measures adopted by the State have been fundamental for the protection of the beneficiary's rights, in particular her health condition living with HIV, which is evidenced by the improvements presented over time.

d. *Agreement between the parties.*

- i. The Commission stresses the efforts and actions of the parties in seeking the protection of the beneficiary and takes note of the holding of conciliation meetings on November 1 and December 12, 2018, and on February 20 and 28, 2019. In addition, given the non-continuity of the persons accredited with the institutions to which they belonged and the changes in representation, after corroborating the will of the beneficiary, it is emphasized that the State fully recognized that character. The Commission recalls that an open and good faith dialogue between the parties is essential for the implementation of the precautionary measures.

26. In evaluating compliance with the procedural requirements, and based on the review conducted, the Commission does not identify the existence of a current situation presenting a risk, given the change in the beneficiary's legal and factual circumstances. In this regard, considering the information provided, it is not possible to identify new threatening situations. The IACHR acknowledges the efforts made by the Panamanian authorities to comply with this measure.

27. In the matter at hand, considering the nature of the precautionary measures mechanism, along with the information available and the analysis carried out, the Commission understands that, to date, it has no elements to support compliance with the requirements of Article 25 of its Rules of Procedure. In view of the above, and taking into account the exceptional and temporary nature of precautionary measures,<sup>10</sup> the Commission deems it appropriate to lift the adopted precautionary measures.

28. Lastly, the Commission emphasizes that regardless of the lifting of these measures, in accordance with Article 1(1) of the American Convention, it is the obligation of the State of Panama to respect and guarantee the rights recognized therein.

**V. DECISION**

29. The Commission decides to lift the precautionary measures granted to M. B. B. P., in Panama.

30. The Commission recalls that the lifting of these measures does not prevent the representation from filing a new request for precautionary measures, should they consider that there exists a situation presenting a risk that meets the requirements set forth in Article 25 of its Rules of Procedure.

31. The Commission instructs its Executive Secretariat to notify this resolution to the State of Panama and the representatives.

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

Tania Reneaum Panszi  
Executive Secretary

<sup>10</sup> I/A Court H.R., Matter of Adrián Meléndez Quijano et al., Provisional Measures regarding El Salvador, Order of August 21, 2013, para. 22; Matter of Galdámez Álvarez et al., Provisional Measures regarding Honduras, Order of November 23, 2016, para. 24.