

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 83/2025**

Precautionary Measures No. 1375-25, 1385-25, and 1573-25

**Macario Bonifacio González Arias, his family unit, Enrique Octavio Márquez Pérez,
Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres
regarding Venezuela**

November 17, 2025

Original: Spanish

I. INTRODUCTION

1. On September 20, September 22, and October 24, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received three requests for precautionary measures filed by Guillermo Antonio Palacios Castillo, Sonia Yolitza Lugo Gómez, and the CASLA Institute, respectively, (“the applicants”) 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) Macario Bonifacio González Arias and his family unit, (2) Enrique Octavio Márquez Pérez, (3) Merys Torres de Sequea, and (4) Ana Zoris Gutiérrez Torres (“the proposed beneficiaries”). According to the requests, the whereabouts of Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres, following their detention in September 2025, are unknown. In turn, Enrique Octavio Márquez Pérez is reportedly being held incommunicado, without information on his detention conditions or health, after being detained in January 2025. The wife, daughter, and granddaughter of Macario Bonifacio González Arias are allegedly being harassed and followed by State agents.

2. The Commission requested additional information from the applicants on September 30, October 23 and 28, 2025. Pursuant to the provisions of Article 25(5) of its Rules of Procedure and the Inter-American Convention on Forced Disappearance of Persons, the Commission requested information from the State on October 15, November 3 and 10, 2025. The applicants submitted additional information on October 6, 12, 21, 28, 29 and 30, 2025. The State has not provided a response on the situation of the proposed beneficiaries, and the granted timeline has 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, personal integrity, and health are at risk of irreparable harm. Therefore, pursuant to Article 25 of its Rules of Procedure, the Commission requests that Venezuela: a) adopt the necessary measures to protect the rights to life, personal integrity, and health of the beneficiaries; b) report whether Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres are in the custody of the State and, if so, indicate the place, reason, and circumstances of their detention; or else, the measures taken to determine their whereabouts or fate; c) implement sufficient measures to ensure that the detention conditions of Enrique Octavio Márquez Pérez, and of Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres, if they are in detention, are compatible with applicable international standards. In particular, the following: i. facilitate communication with their family members, representatives and trusted lawyers, giving them full access to the judicial file, if any; ii. 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 has oversight of their criminal cases, or if they have not appeared before a court, clarify the reason why they have not done so; iii. immediately carry out a medical assessment on their health situation, and guarantee timely and specialized medical care and treatment, informing their family members and representatives of the results; d) take the necessary measures to ensure that Anabella Liliana Machado Astudillo, María Verónica González Machado, and M.A.C.G. are not subjected to threats, harassment, intimidation or acts of violence; 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 facts 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 applicants

- ***PM-1375-25 (Macario Bonifacio González Arias, his wife Anabella Liliana Machado Astudillo, his daughter María Verónica González Machado, and his granddaughter M.A.C.G.)***

4. Macario Bonifacio González Arias is 73 years old. He is a member of the *Voluntad Popular* party, former mayor of Barquisimeto, former deputy of the National Assembly and university professor. It was indicated that, during the primary election of September 2023 and the presidential election of July 28, 2024, he worked together with the democratic parties of the Venezuelan opposition in the organization of the electoral register, promotion, mobilization and defense of the vote. As a result of his political work, he was allegedly subjected to persecution, harassment and surveillance both on the street and at home.

5. On September 12, 2025, the proposed beneficiary was last seen leaving the facilities of the Fermín Toro University, in the state of Lara, where he taught Constitutional Law and Municipal Law. Subsequently, his wife tried to communicate with him by phone call, but he did not answer. The requesting party indicated that on that day they initiated the search actions at the Antonio María Pineda Hospital and at the Social Security of Barquisimeto, without being possible to find that he was in any of these places. The applicants consider that he was detained by officials of the Bolivarian National Intelligence Service (SEBIN).

6. On September 13, 2025, the requesting party undertook a tour of the different security forces of the state of Lara, the Special Operations Group (GOES), the Bolivarian National Police (PNB), the National Anti-Extortion and Kidnapping Command (CONAS), the Directorate of Strategic and Tactical Actions (DAET), the General Directorate of Military Counterintelligence (DGCIM), and the SEBIN. None of these sites allegedly provided information about his whereabouts. The request noted that during the visit to the SEBIN, they observed the vehicle of the proposed beneficiary parked at the site. When the requesting party demanded to see him, the officials allegedly said that the vehicle was not the proposed beneficiary's and that they had not detained him, and proceeded to remove the applicants from the place. On a new visit to that headquarters, the vehicle was longer parked there.

7. On September 14, 2025, the applicants went to the Superior Prosecutor's Office of the Public Ministry of Barquisimeto to file a complaint for the "enforced disappearance" of the proposed beneficiary. However, it was stated that the officials of the agency refused to receive it, declaring themselves incompetent to do so. On the same day, the applicants went to court and filed a writ of *habeas corpus*, which was allegedly assigned to the First Court of Control of the Criminal Judicial Circuit of Barquisimeto, state of Lara. However, the request highlighted that it has not received a response or a judicial decision in this regard.

8. On September 15, 2025, the applicants filed a complaint for the "enforced disappearance" of the proposed beneficiary with the Ombudsperson's Office of Barquisimeto. The requesting party detailed that they went repeatedly to that body, without obtaining a response. Informally, that entity allegedly stated that the file was sent to the national headquarters of the Ombudsperson's Office in Caracas. On September 15, 2025, they also attended the Scientific, Penal, and Criminalistic Investigations Corps (CICPC), where they denounced the situation of the proposed beneficiary. However, there is purportedly no progress in the investigation.

9. On September 19, 2025, the applicants indicated that they held a meeting with an official of the Office of the High Commissioner of the United Nations, formalizing the complaint for the "enforced

disappearance” of the proposed beneficiary. In this regard, the request reported that a form had been sent to the United Nations Working Group on Enforced Disappearances on September 25, 2025.

10. On September 19, 2025, one of the proposed beneficiary’s daughters went to detention centers in the city of Caracas, such as El Helicoide, the DGCIM in Boleíta, the PNB Zone 7 in Boleíta, the PNB La Yaguara headquarters, and the Directorate of Criminal Investigation (dip) in Maripérez, without obtaining a response from her father. The applicants stated that they continued to visit the detention centers on September 20 and 22, on October 10, 13, 14, 15 and 25, 2025, and the search was negative. They alerted that the wife has suffered aggressive treatment by SEBIN and DGCIM officials when asking about the proposed beneficiary’s whereabouts.

11. On October 17, 2025, the applicants filed a complaint for the “enforced disappearance” of the proposed beneficiary with the Attorney General’s Office of the Public Ministry of the Republic. On October 21, 2025, the proposed beneficiary’s wife visited the national headquarters of the Ombudsperson’s Office in Caracas, where they allegedly told him that they did not have any file sent from Barquisimeto. On October 22, 2025, the wife visited this place again, requesting procedural information about her husband, without receiving a response. On that day, she also went to the Document Reception Unit of the Criminal Judicial Circuit of Caracas, but there she was also unable to know the procedural stage of the proposed beneficiary. In sum, she visited the courts located in Caracas requesting a response about him, but they told him that his name was not in the records of prosecuted persons.

12. Regarding the health situation of the proposed beneficiary, it was highlighted that he has high blood pressure and severe prostate inflammation, conditions that would require medication and permanent medical monitoring. It was specified that he needs to take medications such as Losartan Potassium 50 milligrams in the morning, Nebivolol 5 milligrams at night,¹ as well as attend medical control every three months for prostate inflammation.

13. The family of the proposed beneficiary, consisting of Anabella Liliana Machado Astudillo (wife), María Verónica González Machado (daughter), and M.A.C.G. (10-year-old granddaughter), are reportedly subject to harassment and persecution by SEBIN patrols. It was stated that, on September 16, 2025, at 7:00 a.m., a white SEBIN van was observed, without license plates, parked in front of the school of the girl M.A.C.G. during her entry time. According to the school’s security personnel, SEBIN officers were watching María Verónica González Machado, while she was leaving M.A.C.G. When she left, the officers also left. The applicant reported that María Verónica González Machado is a political leader of the Voluntad Popular party and was a student leader of the Universidad de los Andes. In this regard, the request noted that it has obtained information that state officers could detain the daughter of the proposed beneficiary.

14. On October 11, 2025, at 9:00 a.m., a van allegedly belonging to SEBIN was reportedly outside the home of the proposed beneficiary and his family. The residential complex’s guards informed the condominium board that the SEBIN officers demanded that they be allowed entry because they were heading to a condominium on the residential complex, without specifying the number of the house or the owner they wanted to see. The guards prevented entry, and with the support of a condominium board member, they were required to show a warrant in order to enter. The officials insisted on entering, and within an hour they withdrew, reporting that they would return at another time. The guards contacted the proposed beneficiary’s wife to alert her to the situation.

15. Finally, it was stated that the general director of the Situational Room of the Secretariat of People’s Power for Citizen Security and Peace, attached to the governorate of the state of Lara, resides in the same residential complex. Likewise, recently, an official of the DGCIM of the state of Lara reportedly bought a

¹ The medical record of June 26, 2023, prepared by Asociación Cardiovascular Centro Occidental, was attached, indicating that the reason for the consultation is a “cardiovascular control,” and orders the following treatment: “NEBICARD, TABLETS 5 mg, VO Nebivolol: Take 2.5 mg, once a day: LOSARTAN, TABLETS 50 mg. orally.”

house in one of the condominiums where the proposed beneficiaries live. The requesting party points out that these agencies act in coordination with the intelligence corps of the government of Venezuela.

- ***PM-1385-25 (Enrique Octavio Márquez Pérez)***

16. Enrique Octavio Márquez Pérez is 62 years old. He is an engineer, Venezuelan politician, and former presidential candidate during the elections of July 28, 2024. In this context, he allegedly filed appeals to review the legality of the results of that electoral process before the Court of Justice. It was reported that on January 7, 2025, upon leaving his residence, he was intercepted by four armed men in civilian clothes, who, without presenting an arrest warrant, allegedly forced him to board a silver vehicle without license plates. Friends and neighbors identified the men as SEBIN officers. At that time, the State did not issue any official information about his whereabouts, the causes or reasons for his detention. The request labeled the situation as an “enforced disappearance.”

17. The applicant stressed that it was aware that he was apprehended by state agents through a public statement by the Ministry of the Interior, Justice and Peace on its television program. The request mentioned that, on January 10, 2025, in a national television program of political opinion, its moderator disclosed that the proposed beneficiary had been detained for being linked to an email whose text allegedly mentioned acts related to the inauguration of the Presidency of the Republic on January 10, 2025.

18. The request revealed that, 10 days after the arrest, the requesting party was informed by third parties that the proposed beneficiary was allegedly in the Center for Prosecuted and Sentenced Persons in the Metropolitan Area of Caracas I, El Helicoide. It was stressed that the spouse, in an “almost clandestine” way, has brought her food and clothes, being cared for through a perimeter gate in El Helicoide. However, the applicant stated that it has not been allowed access to or effective communication with the proposed beneficiary. The request highlighted that, since the arrest, neither the family nor the lawyer have received formal notification from the apprehending police body, the Public Prosecutor’s Office or any court in the country about the grounds for his detention.

19. In February 2025, the requesting party tried to appoint a private defender. For this purpose they appeared before the First Court with Jurisdiction in Terrorism Crimes. However, the clerk noted that such a court would not proceed with that designation. Despite the insistence of the private lawyer, the answer would be that the detainee had to make the personal designation at the place of his confinement and according to the established forms. Then, he went to the Document Reception and Distribution Unit (URDD) of the Criminal Judicial Circuit to request information through the identity card and personal data of the proposed beneficiary, regarding any records of cases and the identification of the court that may be hearing any cause related to the proposed beneficiary. However, the official reportedly stated that “the system did not show any record of said person.”

20. At that time, the requesting party moved to the headquarters of El Helicoide with the private defender. There the officers told them that, “by indication,” even from the director of the establishment, it was not allowed for the proposed beneficiary to designate a private defender.

21. On March 20, 2025, an attempt was made to file a writ of *habeas corpus* due to the lack of information on the proposed beneficiary’s whereabouts, health condition, and the absence of records on his detention. That appeal was not received in the URDD of the Criminal Judicial Circuit. In the face of the refusal, the private lawyer filed a formal complaint with the Presidency of the Criminal Judicial Circuit on March 21, 2025, without having obtained a response to date or an acknowledgment of receipt.

22. On April 2, 2025, the private lawyer filed a complaint with the Office of the Attorney General of the Republic, requesting that a criminal investigation be opened against the State agents for the possible commission of the crimes of illegitimate deprivation of liberty and intentional omission of functions to the

detriment of the proposed beneficiary. However, the complaint has not been prosecuted and there is no response in this regard.

23. On October 9, 2025, the proposed beneficiary's wife was able to visit him in El Helicoide, nine months after his deprivation of liberty. However, it was noted that since then he has not been allowed to receive more visits or calls, so to date he is reportedly incommunicado. In addition, the request expressed concern about the proposed beneficiary's health, since he allegedly suffers from hypertension, hemophilia, and rosacea. His family is said to have no information about the medical care he receives.

24. Finally, the applicant stressed that to date the proposed beneficiary is reportedly in a situation of solitary confinement and isolation. He argued that the lack of response on his procedural situation, the denial of access to a lawyer of his choice and the incommunicado detention to which he is being subjected constitute cruel and inhuman treatment for both him and his family.

- ***PM-1573-25 (Merys Torres de Sequea and Ana Zoris Gutiérrez Torres)***

25. Merys Torres de Sequea, 71, and her niece Ana Zoris Gutiérrez Torres, 63, are relatives of Antonio José Sequea, a captain in the Bolivarian National Guard who has been detained in Rodeo I since 2020. The requesting party specified that he is the son of Merys Torres de Sequea.

26. The request reported that, on September 20, 2025, they both left their residence with the aim of purchasing medication for Antonio José de Sequea. On that occasion, they were allegedly arbitrarily detained by hooded men, armed and dressed in black, who allegedly claimed to be officials of the PNB. The detention occurred without an arrest warrant and without the knowledge of an investigation against him. Since that day, her relatives have not had any information on the proposed beneficiaries, nor has there been any official or extraordinary pronouncement on their detention, which is why the situation was called a "forced disappearance." The requesting party added that there has been no "faith in life," and assured that this fact is part of a pattern of reprisals against relatives of the so-called "political prisoners" in Venezuela.

27. The search actions allegedly began on September 20, 2025, and the following days, in which the relatives did not receive a response anywhere. In particular, it was alleged that family members and organizations have made complaints about her "enforced disappearance" in national and international media.² The daughter of Ana Zoris Gutiérrez Torres visited El Helicoide, the CICPC, the DGCIM of Boleíta, and the headquarters of the PNB of Maripérez. The officers allegedly denied that the proposed beneficiaries were in those places. She also went to the Ombudsperson's Office, the Public Ministry, the Prosecutor's Office, and the CICPC to try to file a complaint, but the officers refused to receive it. For example, it was indicated that in the Prosecutor's Office they ignored her and left her sitting for a long time, then told her to leave. At the CICPC, she was reportedly asked what links she had with the detainees, to which she replied that she was the daughter of Ana Zoris Gutiérrez Torres and the officers told her that the children of Merys Torres de Sequea should come personally to file the complaint. However, the request explained that the children of Merys Torres de Sequea are detained by order of the Prosecutor of Venezuela and their daughter is in exile in Colombia, so they cannot file a complaint. In addition, the daughter of Ana Zoris Gutiérrez Torres noted that she is afraid to continue denouncing, and that she has not been able to get a lawyer to accompany her because they are also terrified. In this sense, the request noted about the total impossibility of the family to activate internal mechanisms.

28. On the other hand, it was reported that Merys Torres de Sequea suffers from severe arterial hypertension, arthritis, spondylitis with wear of three vertebrae, wear on the patella of the left knee, vertigo, and headaches. Therefore, it was reported that he should take two tablets of Losartan Potassium 50 mg daily; Metrotrexate tablet 2.5 mg once a week for arthritis spondylitis; and Pregabalin 75 mg twice a day for joint

² Such as NTN24, EFE, El Nacional, Contrapunto, and Crónica Uno.

pain. The applicant reported that when she went to visit her son in the Rodeo I jail, she was hooded, as they allegedly do with all the family members. During these visits, she used to suffer increases in tension and nervous breakdowns, even fainting. For her part, Ana Zoris Gutiérrez Torres suffers from hypertension, so she would need to take Losartan Potassium 50 mg daily. The relatives expressed fear for the lives and physical integrity of both.

B. Response from the State

29. The Commission requested information from the State on October 15, November 3 and 10, 2025, according to the corresponding records. To date, the State has not responded, and the granted deadline has expired.

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

30. 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 an irreparable harm to persons.

31. 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:

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 the 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.

- 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.

32. 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

33. 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 Similarly, 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

34. 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.

35. In 2024, the Commission condemned the practices of institutional violence in the context of the electoral process in Venezuela, such as violent repression, arbitrary detentions, and political persecution.¹⁴ The strategy of detention and criminalization appears to be specifically targeted at individuals perceived as

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 indicated 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.” See in this regard: 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.

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, [Press Release No. 184/24](#), IACHR and SRfOE condemn State terrorism practices in Venezuela, August 15, 2024.

opponents of the regime, including journalists, opposition leaders, human rights defenders, and others.¹⁵ On December 27, 2024, the IACHR approved the report titled “Venezuela: Serious Human Rights Violations in the Electoral Context” and reaffirmed that the State has been engaging in practices such as “arbitrary arrests of opponents, human rights defenders, and social leaders,”¹⁶ while using “terror as a tool of social control.”¹⁷

36. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.¹⁸ The IACHR identified that relatives have not yet received a formal communication about the detention center where their loved ones are held.¹⁹ 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.²⁰

37. During its 192nd session, 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.²¹

38. On September 8, 2025, during the 60th Session of the United Nations Human Rights Council, the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela reaffirmed its concern about the state’s practice of solitary confinement and incommunicado detention, which, it noted, often amounts to enforced disappearances, as well as the widespread lack of effective judicial protection.²² It said that, for the most part, the search processes undertaken by family members, human rights organizations, and private lawyers began immediately after the detention.²³ However, in most cases, the consulted authorities denied having the detainees in their custody, even though they were actually detained under their authority.²⁴

39. The Mission pointed out that, not only are the security forces that proceed with the arrests and hold people in their custody illegally responsible for the enforced disappearances, but also the prosecutor’s office that provides false legal coverage, the judicial system that covers up the crime and does not allow the operation of judicial guarantees, to the point of not even receiving habeas corpus resources, and the omission in the performance of its functions of the Ombudsperson’s Office.²⁵ It warned that all these actors are part of the repressive machinery of the State that act in a coordinated manner.²⁶ The Mission described that, in the context of the apprehension, interrogation and detention of political opponents or perceived as such, patterns have been identified that include solitary confinement, prolonged solitary confinement, the use of punishment cells, physical and psychological abuse, acts of sexual violence, forced nudity, coercive transactional sex, the use of electricity on the genitals, threats to coerce self-incrimination or the incrimination of third parties, as

¹⁵IACHR, Press Release No. 184/24, previously cited.

¹⁶ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

¹⁷ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5.

¹⁸IACHR, [Press Release No. 72/25](#), Venezuela Must End the Incommunication of Political Prisoners and Release Them Immediately, April 11, 2025.

¹⁹IACHR, Press Release No. 72/25, previously cited.

²⁰IACHR, Press Release No. 72/25, previously cited.

²¹IACHR, [Press Release No. 50/25](#), IACHR ends the 192nd Period of Sessions with 32 hearings on human rights, March 7, 2025.

²²United 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. 103.

²³ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 267.

²⁴ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 267.

²⁵ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 277.

²⁶ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 277.

well as threats to harm the family members of detainees.²⁷ In addition to the above, the Mission highlighted that a sustained and systematic pattern of detention of family members of opponents or perceived as such has been identified, which responds to a policy of repression aimed at generating fear and social control.²⁸

40. Consequently, the Commission understands that the circumstances in which the proposed beneficiaries find themselves, along with the monitoring of the country carried out by the IACHR and other international organizations, are relevant in the analysis of the procedural requirements.

41. 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:

- a. The political trajectory or critical position before the current government of the proposed beneficiaries, as well as the family situation in the Venezuelan context, places them in a position of visibility. In particular:
 - i. Macario Bonifacio González Arias is a member of the Voluntad Popular party, former mayor of Barquisimeto and former deputy of the National Assembly. It was noted that a result of his political work, he has been allegedly subjected to persecution, harassment and surveillance both on the street and at home.
 - ii. The family of Macario Bonifacio González Arias consists of Anabella Liliana Machado Astudillo (wife), María Verónica González Machado (daughter), and M.A.C.G. (10-year-old granddaughter). According to the information provided, they have been subjected to acts of harassment and persecution by SEBIN officials, including at the girl's school. It was highlighted that María Verónica González Machado is a political leader of the Voluntad Popular party and, as reported, state officials are reportedly trying to stop her.
 - iii. Enrique Octavio Márquez Pérez is a Venezuelan politician and former presidential candidate. His involvement in national political processes would also place him in a scenario of visibility in the current context of the country.
 - iv. Merys Torres de Sequea and Ana Zoris Gutiérrez Torres are relatives of Captain Antonio José Sequea. According to information available in the media, he is reportedly deprived of liberty for crimes of terrorism and treason due to his alleged participation in *Operation Gideon*, an armed attempt against Nicolás Maduro that occurred in May 2020²⁹.
- b. This is relevant insofar as it is consistent with the information received about acts directed against persons linked to the political opposition and their families, a situation that has been amply documented by the Commission³⁰ and other international organizations³¹, which places the proposed beneficiaries in a condition of special vulnerability in the current context of the country.

²⁷ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 308.

²⁸ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 116.

²⁹ Crónica Uno, [Sequea family has suffered forced disappearances, political persecution and exile since 2019](#), September 22, 2025.

³⁰ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para.

³¹ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited.

- c. In addition, since September 2025, the whereabouts or location of Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres have been unknown, with about two months having elapsed since then. This situation has persisted despite various search efforts, including visits to detention centers where authorities denied having any information. The applicants characterized the condition of these persons as a “forced disappearance.”
- d. In the case of Enrique Octavio Márquez Pérez, his spouse alerted that she was able to visit him on October 9, 2025, that is, nine months after his detention. However, they warned that since then he has not been allowed to receive visits or calls, so he is reportedly incommunicado and under isolation. In this context, the Commission finds that his family has no information on his detention conditions or his current health, since the only visit over a month ago.
- e. The Commission 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.³² It has also considered that prolonged isolation and incommunicado detention constitute, in themselves, forms of cruel and inhuman treatment.³³ The Court has also affirmed that the incommunicado detention “not only makes it impossible to verify the current situation of the proposed beneficiaries, their conditions of detention and their health status, but also it implies a curtailment of the procedural guarantees of all detainees.”³⁴ For this reason, the Court has also highlighted that States must ensure that persons deprived of their liberty are able to contact their relatives.³⁵
- f. Therefore, the Commission notes that the relatives of Macario Bonifacio González Arias, Enrique Octavio Márquez Pérez, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres do not have any information about their situation, such as the charges against them, the case file number, the competent court, the existence of a court order that led to their deprivation of liberty, or the conditions of their detention.
- g. In relation to the health condition of the proposed beneficiaries, it was reported that: (i) Macario Bonifacio González Arias has arterial hypertension and severe prostatic inflammation; (ii) Enrique Octavio Márquez Pérez suffers from hypertension, hemophilia, and rosacea; (iii) Merys Torres de Sequea suffers from severe arterial hypertension, arthritis, spondylitis with wear of three vertebrae, wear on the patella of the left knee, vertigo, and headaches. It was highlighted that, during the visits to her son Antonio José Sequea in the El Rodeo I prison, she suffered increases in tension and nervous breakdown, even fainting; and (iv) Ana Zoris Gutiérrez Torres has hypertension. All of the above individuals would require specific medication. However, in none of the cases is there an answer regarding whether they

³² 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; [Case of Cantoral-Benavides v. 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.

³³ 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.

³⁴ I/A Court H.R., [Matter of Juan Sebastián Chamorro et al. regarding Nicaragua](#), Provisional Measures, Order of June 24, 2021, paragraph 36.

³⁵ 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 regarding Venezuela, already cited; IACHR [Principles and Good Practices on the Protection of Persons Deprived of Liberty in the Americas](#), adopted by the Commission during the 131st Regular Period of Sessions, held from March 3 to 14, 2008, Principle XVIII.

receive medical attention, their current health or whether they have undergone a medical evaluation.

- h. The situation of Macario Bonifacio González Arias (73), Enrique Octavio Márquez Pérez (62), Merys Torres de Sequea (71), and Ana Zoris Gutiérrez Torres (63) is especially serious as they are older adults. In this sense, the Inter-American Court understands that age is a factor to take into account, insofar as it demands special protection measures in view of the life cycle and the risk factors associated with aging.³⁶ The Court has highlighted that older people face a particular vulnerability in terms of access to health, due to various factors such as physical limitations, mobility problems, economic conditions, severity of diseases, and the possibilities of recovery; so it has underlined the need to guarantee the elderly, in a clear and understandable way, all the necessary information about their diagnosis or specific situation, as well as the measures or treatments available to address their condition.³⁷ Consequently, the Court has determined that they are entitled to reinforced protection that requires the adoption of differentiated measures,³⁸ as long as they are members of a vulnerable or high-risk group.³⁹
- i. Regarding domestic judicial remedies, the Commission finds that, in the case of Macario Bonifacio González Arias, an attempt was made to file a complaint with the Superior Prosecutor's Office of the Public Ministry of Barquisimeto; however, it was not received. However, a writ of *habeas corpus* and complaints about his disappearance were later filed with various state agencies, and to date they remain unanswered. In the case of Enrique Octavio Márquez Pérez, his spouse tried to appoint a trusted attorney and a writ of *habeas corpus*, but these resources were not received. In the case of Merys Torres de Sequea and Ana Zoris Gutiérrez Torres, a complaint was filed with the Ombudsperson's Office, the Public Ministry, the prosecutor's office, and the CICPC, but it was stated that the officers refused to receive it.
- j. Under the circumstances described above, the Commission finds that the relatives and representatives lack real possibilities to activate internal actions in favor of the proposed beneficiaries, which places them in a state of absolute helplessness. Therefore, while this situation persists, the Commission considers that the proposed beneficiaries are completely unprotected against the risks they may be facing in Venezuela.

42. 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 that places the proposed beneficiaries at risk. Therefore, the Commission does not have elements that would allow it to dispute the facts alleged in the requests, nor to assess whether the risk that the proposed beneficiaries face has been addressed or mitigated. In this regard, the Commission expresses its particular concern given that State agents have been identified as allegedly responsible for the detention of Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres. It has also been indicated that these agents were also involved in acts of harassment, surveillance and persecution against the members of the family of Macario Bonifacio González Arias. In the case of Enrique Octavio Márquez Pérez, it would be the state agents who keep him in solitary confinement.

³⁶ I/A Court H.R., Advisory Opinion OC-29/22, [Differentiated Approaches with respect to Certain Groups of Persons Deprived of Liberty](#), of May 30, 2022, para. 65.

³⁷ I/A Court H.R., [Case of Poblete Vilches et al. v. Chile](#), Judgment of March 8, 2018, para. 131.

³⁸ I/A Court H.R., [Case of Poblete Vilches et al. v. Chile](#), previously cited, para. 127.

³⁹ IACHR, [Principles and Good Practices on the Protection of Persons Deprived of Liberty in the Americas](#), adopted by the Commission during the 131st Regular Period of Sessions, held from March 3 to 14, 2008, Principle XVIII.

43. The previous considerations lead this Commission to understand that these are particularly concerning and serious situations, to the extent that State agents are obliged to guarantee the respect and protection of human rights within the framework of Article 1(1) of the American Convention on Human Rights.

44. 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 presenting a serious risk to their rights to life, personal integrity, and health in Venezuela.

45. Regarding the requirement of *urgency*, the Commission finds that it has been fulfilled, insofar as the whereabouts of Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres remain unknown, and because, with the passage of time, the likelihood of violations of their rights increases. In the case of Enrique Octavio Márquez Pérez, the Commission finds that his situation as a person deprived of liberty, the lack of communication with his family, and the absence of information on his detention conditions and current health, expose him to a greater impact on his rights. In the case of Anabella Liliana Machado Astudillo, María Verónica González Machado, and the child M.A.C.G., the Commission observes that the acts of harassment and surveillance, including the presence of vehicles near the child's school and family residence, show a situation posing a risk that could materialize at any time in the current context of the country.

46. In addition to the above, the Commission highlights the inability of the family members and representatives to initiate effective internal measures to protect the rights of the proposed beneficiaries. In addition, the Commission does not have a response 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 their rights to life, personal integrity, and health.

47. Regarding the requirement of *irreparable harm*, the Commission maintains that it has been met, insofar as the potential impact on the rights to life, personal integrity, and health constitutes the maximum situation of irreparability.

IV. BENEFICIARIES

48. The Commission declares as the beneficiaries of the precautionary measures: (1) Macario Bonifacio González Arias, (2) Enrique Octavio Márquez Pérez, (3) Merys Torres de Sequea, (4) Ana Zoris Gutiérrez Torres, and the members of the family unit of Macario Bonifacio González Arias, composed of (5) Anabella Liliana Machado Astudillo, (6) María Verónica González Machado, and (7) M.A.C.G. All the beneficiaries are duly identified in this proceeding.

V. DECISION

49. 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, personal integrity, and health of the beneficiaries;
- b) report whether Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres are in the custody of the State and, if so, indicate the place, reason, and circumstances of their detention; or else, the measures taken to determine their whereabouts or fate;

- c) implement sufficient measures to ensure that the detention conditions of Enrique Octavio Márquez Pérez, and of Macario Bonifacio González Arias, Merys Torres de Sequea, and Ana Zoris Gutiérrez Torres, if they are in detention, are compatible with applicable international standards. In particular, the following:
 - i. facilitate communication with their family members, representatives and trusted lawyers, giving them full access to the judicial file, if any;
 - ii. 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 has oversight of their criminal cases, or if they have not appeared before a court, clarify the reason why they have not done so;
 - iii. immediately carry out a medical assessment on their health situation, and guarantee timely and specialized medical care and treatment, informing their family members and representatives of the results;
- d) take the necessary measures to ensure that Anabella Liliana Machado Astudillo, María Verónica González Machado, and M.A.C.G. are not subjected to threats, harassment, intimidation or acts of violence;
- 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 facts that gave rise to this resolution, so as to prevent such events from reoccurring.

50. 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.

51. 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.

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

53. 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; and Carlos Bernal Pulido, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary