

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 94/2025**

Precautionary Measures 350-12, 420-12, and 34-13

Yoani María Sánchez Cordero, Antonio G. Rodiles, and “X” regarding Cuba

December 20, 2025

Original: Spanish

**I. SUMMARY**

1. The Inter-American Commission on Human Rights (IACHR) decides to lift the precautionary measures in favor of Yoani María Sánchez Cordero, Antonio G. Rodiles, and “X” regarding Cuba. The IACHR identified that the State of Cuba did not comply with its duty to provide information to this body. However, the representation did not respond during the time the precautionary measures were in force, which would have allowed this Commission to consider the requirements of Article 25 of the Rules of Procedure to have been met. Consequently, the IACHR has decided to lift these precautionary measures.

**II. BACKGROUND INFORMATION**

2. The following is the available background information on the status of the records of the three precautionary measures:

**a. PM-350-12 (Yoani María Sánchez Cordero)**

3. On November 9, 2012, the IACHR granted precautionary measures in favor of Yoani María Sánchez Cordero and her family unit, in Cuba. The request alleged that Yoani María Sánchez Cordero was at risk due to the publication of several articles on an Internet blog about the human rights situation in Cuba. In particular, they alleged threats, harassment, and smear campaigns against her. The request stated that Yoani María Sánchez Cordero and her husband were detained on October 4, 2012, and that they were subsequently assaulted by police officers. As a result, Yoani María Sánchez Cordero sustained a fractured tooth and bruises. She was detained again on November 8, 2012. The IACHR requested that the State of Cuba adopt the necessary measures to guarantee the life and physical integrity of Yoani María Sánchez Cordero and her family unit; consult and agree upon the measures to be implemented with the beneficiaries and their representative; and report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure.<sup>1</sup>

4. The IACHR adopted an admissibility and merits report of the beneficiary’s case<sup>2</sup> on October 30, 2021.

**b. PM-420-12 (Antonio G. Rodiles)**

5. On December 18, 2012, the IACHR granted precautionary measures in favor of Antonio G. Rodiles, in Cuba. The applicants stated that on November 8, 2012, following a protest, police officers beat and detained the beneficiary with the aim of obtaining information about the situation of human rights defender and independent journalist Yaremis Flores, who had allegedly been detained earlier that year. The IACHR requested that the State of Cuba adopt the necessary measures to guarantee the life and personal integrity of Antonio G. Rodiles; consult and agree upon the measures to be implemented with the beneficiaries and their

<sup>1</sup> IACHR, [Annual Report 2012](#), Chapter 3, p. 77, para. 19. The representation requested that the identity remain confidential.

<sup>2</sup> IACHR, [Report No. 297/21, Case 13.639. Admissibility and Merits \(Publication\)](#), Yoani María Sánchez Cordero, Cuba, October 30, 2021.

representatives; and report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure.<sup>3</sup>

6. During the time the precautionary measures were in force, Cubalex exerted representation before the Commission. On November 6, 2025, Cubalex reported that it no longer legally represented the beneficiary in this matter.

**c. PM-34-13 (“X” or A.H.)**

7. On February 14, 2013, the IACHR granted precautionary measures in favor of “X”, in Cuba. The request stated that “X,” aged 15, had been attacked for defending a relative who was a member of the *Damas de Blanco*. The applicants alleged that a relative of a Police Captain attacked the girl with a knife on November 4, 2012. It was reported that, in January 2013, psychologists from the Department of Legal Medicine had questioned the girl without her mother being present. The aim was reportedly to get her to change her statement about the events reported. The request also alleged that State authorities threatened to commit her to a mental hospital. The IACHR requested that the State of Cuba adopt the necessary measures to guarantee the life and physical integrity of “X”, consult and agree upon the measures to be implemented with the beneficiaries and their representatives; and report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure.<sup>4</sup>

8. *Directorio Democrático Cubano* exerts representation before the Commission.

**III. INFORMATION PROVIDED DURING THE TIME THE MEASURES WERE IN FORCE**

9. During the time the three precautionary measures were in force, the Commission sent requests for information to both parties on the dates indicated below, but did not receive a response on any occasion:

	<b>PM 350-12</b>	<b>PM 420-12</b>	<b>PM 34-13</b>
<b>Requests for information the IACHR sent to the State</b>	November 9, 2012; December 8, 2023; August 14, 2024	December 18, 2012; November 20, 2023; August 16, 2024; July 25, 2025	February 14, 2013; November 29, 2023; August 28, 2024
<b>Requests for information the IACHR sent to the representation</b>	December 21, 2022; December 28, 2022; December 8, 2023; August 14, 2024	December 21, 2022; January 19, 2023, November 20, 2023; August 16, 2024	December 22, 2022; January 19, 2023; November 29, 2023; August 28, 2024

10. In the case of PM 420-12, a working meeting was called to be held on November 13, 2019, within the framework of the 174 Period of Sessions of the IACHR, but it was not carried out.<sup>5</sup>

11. Despite the requests for information sent by the IACHR to the State on the dates indicated above, during the time these three precautionary measures were in force, the State did not provide any information on their implementation.

12. The beneficiaries’ representation have also not responded to the repeated requests for information sent by the IACHR.

<sup>3</sup> IACHR, [Annual Report 2012](#), Chapter 3, p. 78, para. 21.

<sup>4</sup> IACHR, [Annual Report 2012](#), Chapter 3, p. 69, para. 13.

<sup>5</sup> IACHR, [Annual Report 2019](#), Chapter 2, p. 219.

13. On November 6, 2025, the representation of PM 420-12 reported that it no longer legally represented the beneficiary and sent copies of communications with the beneficiary requesting that he contact the IACHR. To date, the beneficiary has not contacted this Commission.

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

14. The precautionary measures mechanism is part of the Commission's function of overseeing compliance with the human rights obligations set forth in Article 106 of the Charter of the Organization of American States. These general oversight functions are provided for in Article 41(b) of the American Convention on Human Rights, as well as in Article 18(b) of the Statute of the IACHR. The mechanism of precautionary measures is set forth in Article 25 of the Commission's Rules of Procedure. In accordance with that Article, the Commission grants precautionary measures in serious and urgent situations in which these measures are necessary to avoid irreparable harm to persons.

15. 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>6</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and protect the exercise of human rights.<sup>7</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>8</sup> 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.<sup>9</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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).

<sup>8</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).

<sup>9</sup> 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).

16. 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.<sup>10</sup> 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.<sup>11</sup> This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of the Rules of Procedure, which can be carried out without making any determination on the merits.<sup>12</sup>

17. The Commission notes that, since the precautionary measures were granted, the State of Cuba has not provided information in response to the requests. The Commission recalls that, as the Inter-American Court of Human Rights has indicated, failure to comply with the State duty to report on all the measures adopted in compliance with its decisions is especially serious, given the legal nature of these measures that seek to prevent irreparable harm to persons in serious and urgent situations.<sup>13</sup> The duty to inform constitutes a dual obligation that requires, for its effective fulfillment, the formal presentation of a document on time, and the specific, true, current and detailed material references to the issues on which that obligation falls.<sup>14</sup>

18. In turn, the Commission observes that the representations also failed to provide any information on the beneficiaries' situation since the precautionary measures were granted. This means there has not been information during the nearly 13 years the measures have been in force. The foregoing prevents this Commission from identifying the validity of a situation of imminent risk to their rights.

19. According to public information, Yoani María Sánchez Cordero continues to work in digital media,<sup>15</sup> while Antonio G. Rodiles continues to engage in public activities.<sup>16</sup> The IACHR does not have information to indicate that any of the individuals is deprived of their liberty.

20. In summary, upon repeated requests for information to the representation, and in the absence of information on the situation of the beneficiaries for an extended period of time, the Commission considers that it is appropriate to proceed to lift the measures, given the impossibility of continuing to determine compliance with the requirements of Article 25 of the Rules of Procedure.

21. Lastly, and in line with what has been set forth by the Inter-American Court in various matters,<sup>17</sup> a decision to lift the precautionary measures does not imply considering, in any way, that the State has effectively complied with the precautionary measures ordered, nor can it imply that the State is relieved from its general protection obligations, in the framework of which the State is especially obliged to guarantee

<sup>10</sup> 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.

<sup>11</sup> 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.

<sup>12</sup> 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).

<sup>13</sup> I/A Court H.R. [Matter of Communities of Jiguamiandó and Curvaradó regarding Colombia](#), Provisional Measures, Order of February 7, 2006, considerandum 16; and [Case of Luisiana Ríos et al. \(Radio Caracas Televisión – RCTV\)](#), Provisional Measures, Order of September 12, 2005, considerandum 17 (Available only in Spanish).

<sup>14</sup> I/A Court H.R. [Matter of Communities of Jiguamiandó and Curvaradó regarding Colombia](#), previously cited.

<sup>15</sup> *14 y medio*, [Cafecito informativo of November 21, 2025](#), November 21, 2025 (Available only in Spanish).

<sup>16</sup> *Diario Las Américas*, [Y mientras, Cuba espera](#), May 1, 2023 (Available only in Spanish).

<sup>17</sup> I/A Court H.R., [Matter of Velásquez Rodríguez](#), Provisional Measures regarding Honduras, Order of January 15, 1988, considerandum 3; [Matter of Giraldo Cardona et al.](#), Provisional Measures regarding Colombia, Order of January 28, 2015, considerandum 40 (Available only in Spanish).

the rights of persons at risk and must promote the necessary investigations to clarify the facts, followed by the consequences that may be established. In the same way, also based on the assessment of the Inter-American Court, the lifting of the precautionary measures, or the declaration of non-compliance with them, does not imply an eventual decision on the merits of the controversy if the case were to be brought before the inter-American system through a petition, nor does it prejudice state responsibility for the events denounced.<sup>18</sup>

**V. DECISION**

22. The Commission decides to lift these precautionary measures in favor of Yoani María Sánchez Cordero, Antonio G. Rodiles, and “X” in Cuba.

23. The Commission recalls that the lifting of these measures does not prevent the representations from filing new requests should they consider that there is a situation that meets the requirements established in Article 25 of its Rules of Procedure.

24. The Commission instructs the Executive Secretariat of the IACHR to notify the State of Cuba and the representations of this Resolution.

25. Approved on December 20, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi  
Executive Secretary

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<sup>18</sup> I/A Court H.R., [Matter of Guerrero Larez, Provisional Measures regarding Venezuela](#), Order of August 19, 2013, considerandum 16; [Matter of Natera Balboa, Provisional Measures regarding Venezuela](#), Order of August 19, 2013, considerandum 16.