

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 96/2025**

Precautionary Measure No. 1824-25

Arnaldo Méndez Silva regarding Venezuela

December 21, 2025

Original: Spanish

I. INTRODUCTION

1. On December 4, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission”, “the Commission” or “the IACHR”) received a request for precautionary measures filed by the Casla Institute (“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 Arnaldo Méndez Silva (“the proposed beneficiary”). According to the request, the proposed beneficiary is a labor union advisor and human rights activist. State agents allegedly detained him on November 26, 2025, and his whereabouts has been unknown since that time.

2. 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 both parties on December 5, 2025. The applicants provided their report on December 8, 2025. To date, the State has not responded, and the granted deadline has expired.

3. Upon analyzing the submissions of fact and law furnished by the requesting party, the Commission recognizes that the beneficiary is in a serious and urgent situation, given that his rights are at risk of irreparable harm. Therefore, pursuant to the provisions of Article 25 of its Rules of Procedure, the Commission requests that Venezuela: a) adopt the necessary measures to protect the rights to life and personal integrity of Arnaldo Méndez Silva. In particular: i. report whether the beneficiary is in the custody of the State and, if so, indicate the reason and circumstances of his detention; or, the measures taken to determine his whereabouts or fate; ii. if the beneficiary is in the custody of the State, indicate whether he has been charged with crimes and whether he has been brought before a competent court to review his detention, if so, expressly mention the court that hears his criminal case, if he has not appeared before a court; clarify the reason why he has not done so, iii. facilitate the beneficiary’s communication with his family, representatives, and trusted attorneys, and give them full access to his judicial file, if any; b) implement the necessary measures so that the beneficiary can carry out his union leadership activities without being subjected to threats, harassment, intimidation, or acts of violence; and c) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

II. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. According to the request, Arnaldo Méndez Silva is a labor union advisor and human rights activist. It was reported that on November 26, 2025, the proposed beneficiary and his family, his wife, sister, brother, and brother-in-law, were at their residence when ten unidentified officials arrived. The officials allegedly acted violently and threatened to kill them if they did not open the door. When his wife asked for an explanation, the officers confiscated the cellphones of those present, pointed a gun at her, and put the proposed beneficiary in a patrol car while hitting him on the body. The other officials who were near the area allegedly kicked him all over his body. It was revealed that the operation was carried out by 30 officials in total. They were hooded, dressed in black, and apparently belonged to the Bolivarian National Intelligence Service

(SEBIN), the National Bolivarian Police (PNB), or parapolice forces, who carried long weapons and were traveling in three patrols without a badge.

5. The applicants stated that the proposed beneficiary was violently “kidnapped” without an arrest warrant and without any known investigation against him. It was reported that from that moment on, his whereabouts have been unknown, and his situation was therefore classified as an “enforced disappearance.” The request added that to date there is no information that the proposed beneficiary has been brought before a court, as the authorities have not reported his detention, do not admit to having him in their custody, nor have they indicated his whereabouts.

6. On December 1, 2025, when the proposed beneficiary’s relatives went to the Human Rights Prosecutor’s Office, officials told them to come back another day with a letter addressed to Prosecutor Tarek William Saab. On December 3, 2025, the proposed beneficiary’s wife returned, but this time they told her that “the system was down.” On December 5, 2025, his wife went to the Ombudsperson’s Office to file a complaint. However, officials reportedly only took her statement, allegedly showed no interest in the complaint, and did not take any action to determine the whereabouts of the proposed beneficiary. In this regard, the request highlighted that it has not been possible to record any effective action before the national authorities. It was also reported that family members visited several detention centers, such as El Helicoide, where authorities denied having any information about him. The applicants expressed fear for the proposed beneficiary’s life.

7. Lastly, the request emphasized that the proposed beneficiary has a spinal deviation due to a car accident he had several years ago, which causes him pain and difficulty standing up, sitting down, and going up and down stairs. As of November 26, 2025, the location and physical condition of the proposed beneficiary is unknown, after having been beaten and kicked all over his body when being detained.

B. Response from the State

8. The IACHR requested information from the State on December 5, 2025. To date, no response has been received from them, and the granted timeline has expired.

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

9. 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.

10. 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.¹ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.² To do this, the IACHR shall assess the

¹ 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.

² 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).

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.³ 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.⁴ 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.

11. 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.⁵ 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.⁶ 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.⁷

12. 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

³ 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).

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 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).

⁵ 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.

⁶ 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.

⁷ 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).

Venezuela has been annexed since its ratification on July 6, 1998,⁸ 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.”⁹ In addition, 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.”¹⁰

13. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,¹¹ 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, known as MESEVE.

14. In 2019, the IACHR highlighted a report by the International Labor Organization (ILO) on Venezuela, noting that an atmosphere of hostility, interference, and exclusion from social dialogue had been created for employers’ and workers’ organizations not aligned with the government.¹² It was also found that harassment, persecution, imprisonment, murders, and assaults against employee and worker organizations not aligned with the government and union leaders occur repeatedly in Venezuela.¹³ In its 2021 annual report, the IACHR highlighted that, as of July 2021, at least 11 union leaders had been detained.¹⁴ The Commission also noted complaints received by the Special Rapporteur on Economic, Social, Cultural, and Environmental Rights, which remarked that there were no guarantees for the exercise of trade union rights in the country, with undue interference in trade union organizations and a pattern of persecution of trade union and professional association leaders.¹⁵

15. In March 2023, the Commission and its Special Rapporteur for Freedom of Expression noted that Venezuela has a hostile environment for human rights organizations, in which smear campaigns, stigmatization, and acts of harassment are rife in retaliation for this activity.¹⁶

16. 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.¹⁷ The strategy of detention and criminalization appears to be specifically targeted at individuals perceived as opponents of the regime, including journalists, trade unionists, opposition leaders, human rights defenders, and others.¹⁸ On December 27, 2024, the IACHR approved the report titled “Venezuela: Serious Human Rights Violations in Connection with the Elections” and reaffirmed that the State has been engaging in practices such

⁸ [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](#).

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

¹⁰ 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.

¹¹ IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, para. 1.; and [2024 Annual Report, Cap. IV.b. Venezuela](#), OEA/Ser.L/V/II, approved on March 26, 2025, para. 1.

¹² IACHR, [2019 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 9, published on February 24, 2020, para. 112.

¹³ IACHR, [2019 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 112.

¹⁴ IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 126.

¹⁵ IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 164.

¹⁶ IACHR, [Press Release No. 036/23](#), IACHR and Its Special Rapporteurship for Freedom of Expression Concerned About Bill to Restrict Citizen Participation in Venezuela, March 6, 2023.

¹⁷ IACHR, [Press Release No. 184/24](#), IACHR and SRfOE condemn State terrorism practices in Venezuela, August 15, 2024.

¹⁸ IACHR, Press Release No. 184/24, previously cited; IACHR, [Press Release No. 159/24](#), IACHR: IACHR Urges Venezuela to End Political Persecution and to Enable Free Elections, July 8, 2024.

as “arbitrary arrests of opponents, human rights defenders, and social leaders,”¹⁹ while using “terror as a tool of social control.”²⁰

17. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.²¹ The IACHR identified that relatives have not yet received a formal communication about the detention center where their loved ones are held.²² 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 send medication or collect dirty laundry.²³

18. 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.²⁴

19. 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.²⁵ 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.²⁶ However, in most cases, the consulted authorities denied having the detainees in their custody, even though they were actually detained under their authority.²⁷

20. In addition to the above, the Mission highlighted the systematic blocking and rejection of *habeas corpus* proceedings in cases of missing persons in Venezuela, which the Mission framed in the context of a lack of impartiality in the justice system that contributes to a State policy of silencing the opposition or those perceived as such.²⁸ The Mission added that in none of the cases it had investigated between September 2024 and August 2025 had the remedy been effective or resulted in any benefit for the alleged victims.²⁹

21. Consequently, the Commission understands that the circumstances which the proposed beneficiary faces, along with the country contextual monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements.

22. With regard to the requirement of *seriousness*, the Commission considers that it has been met. Upon analyzing the proposed beneficiary’s situation, the Commission identifies the following:

¹⁹ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

²⁰ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5.

²¹ IACHR, [Press Release No. 72/25](#), IACHR urges Venezuela to immediately release political prisoners and to end the practice of holding them incommunicado, April 11, 2025.

²² IACHR, Press Release No. 72/25, previously cited.

²³ IACHR, Press Release No. 72/25, previously cited.

²⁴ IACHR, [Press Release No. 50/25](#), IACHR concludes 192nd Period of Sessions after holding 32 human rights hearings, March 7, 2025.

²⁵ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), September 8, 2025, A/HRC/60/CRP.4, para. 103.

²⁶ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 267.

²⁷ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 267.

²⁸ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 296-297.

²⁹ United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 303.

- a. According to publicly available information, the proposed beneficiary holds the position of Labor Affairs Coordinator for the National Trade Union Coalition of Workers (*Coalición Sindical Nacional de Trabajadores*, CSNT³⁰) and has questioned government policies.³¹ In this regard, the Commission notes that his profile as a union leader and visible figure in the labor movement places him in a position of particular exposure and vulnerability in the current context of the country.
- b. The proposed beneficiary was allegedly detained on November 26, 2025, by a group of 30 armed state officials wearing hoods who did not have any identification, and without any communication regarding the existence of an arrest warrant against him.
- c. After being detained, the Commission observes that approximately one month has elapsed without any information regarding his whereabouts, legal status, health, or formal record of his detention. The applicants described the situation as an “enforced disappearance.”
- d. It was stated that, while being detained, the proposed beneficiary was beaten all over his body. In addition, the officials threatened to kill his family, pointed a gun at his wife, and confiscated the phones of those present. There is no information that any judicial authority has authorized or supervised the raid on the residence or the retention of the phones.
- e. It was noted that the proposed beneficiary has a spinal deviation, which causes him pain and difficulty standing up, sitting down, and going up and down stairs. However, his current health and whether he has received medical attention are unknown, especially considering that he was allegedly beaten while being detained.
- f. In this regard, it results concerning that none of the Venezuelan authorities have provided minimal details about his situation. For instance, they have not disclosed his detention conditions; the specific crime for which he would be investigated; the competent court hearing the case; the criminal file number; whether there are judicial orders for his detention and transfer to a penitentiary; if he has undergone a medical evaluation since his detention; or the exact location where he is currently being held.
- g. The Commission notes that family members have taken various steps with the national authorities in order to determine his whereabouts. In particular, it is serious that, after going to the Human Rights Prosecutor’s Office, the relatives have not been attended to, and were even told that “the system is down.” Although the Ombudsperson’s Office obtained the testimony of the proposed beneficiary’s wife, there is reportedly no knowledge of specific actions aimed at locating the proposed beneficiary. It was also reported that family members visited various detention centers, including El Helicoide, where authorities denied having any information about him. In this context, the Commission observes that it has allegedly not been possible to activate effective internal mechanisms.
- h. Under the circumstances described above, the Commission finds that the family members have no real possibility of taking internal action on behalf of the proposed beneficiary, which places him in a state of absolute defenselessness. Therefore, while this situation persists, the

³⁰ Tamara Suju, [@TAMARA_SUJU], (November 26, 2025), Venezuela: On Wednesday, November 26, Labor Affairs Coordinator Arnaldo Méndez (55) of *Coalición Sindical* [Tweet], https://x.com/TAMARA_SUJU/status/1993650249944948886, was violently kidnapped (Available only in Spanish).

³¹ Emisora Costa del Sol 93.7 FM, [In Venezuela they disintegrated the social labor contract, said Arnaldo Méndez Silva](#), October 6, 2025 (Available only in Spanish).

Commission considers that the proposed beneficiary is completely unprotected against the risks he may be facing in Venezuela.

23. Given the proposed beneficiary's situation, the Commission recalls that, according to inter-American standards, the State is obligated to maintain an updated record of detentions, promptly provide information about the person's whereabouts and health, and, if the person is in State custody, present them before a competent judicial authority within legal timeframes while fully respecting judicial guarantees at all times.³² The IACHR also highlights that every detained person has the right to maintain personal and direct contact, through regular visits, with family members, legal representatives, and other persons.³³

24. 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 risk that the proposed beneficiary faces. Therefore, the Commission does not have elements that would allow it to dispute the facts alleged by the applicants, nor to assess whether the risk which the proposed beneficiary faces have been addressed or mitigated.

25. Taking into account the current context in the country and previous assessments, the Commission observes that, based on the applicable *prima facie* standard, it has been sufficiently shown that the proposed beneficiary faces a situation of serious risk to his rights to life and personal integrity in Venezuela, given that since his detention on November 26, 2025, his whereabouts, location, or destination remain unknown to date.

26. Regarding the requirement of *urgency*, the Commission finds that it has been fulfilled, insofar as the proposed beneficiary's whereabouts remain unknown, and because, with the passage of time, the likelihood of violations of his rights increases. In addition to the above, it has been noted that, despite the search efforts and legal actions undertaken by family members and friends, the domestic authorities have not provided any information regarding his whereabouts or offered even minimal information regarding his state since he was detained. In this context, the Commission does not have information from the State to assess the actions that are being taken to address and mitigate the alleged risk faced by the proposed beneficiary. Therefore, it is necessary to immediately adopt measures to safeguard their rights to life and personal integrity.

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

IV. BENEFICIARY

28. The Commission declares Arnaldo Méndez Silva as the beneficiary of the precautionary measures, who is duly identified in this proceeding.

V. DECISION

29. 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:

³² IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 86.

³³ IACHR, [Principles and Best Practices on the Protection of Persons Deprived of Liberty in the Americas](#), adopted by the Commission during the 131st regular session, held from March 3 to 14, 2008, Principle XVIII.

- a) adopt the necessary measures to protect the rights to life and personal integrity of Arnaldo Méndez Silva. In particular:
 - i. report whether the beneficiary is in the custody of the State and, if so, indicate the reason and circumstances of his detention; or, the measures taken to determine his whereabouts or fate;
 - ii. if the beneficiary is in the custody of the State, indicate whether he has been charged with crimes and whether he has been brought before a competent court to review his detention, if so, expressly mention the court that hears his criminal case, if he has not appeared before a court; clarify the reason why he has not done so;
 - iii. facilitate the beneficiary's communication with his family, representatives, and trusted attorneys, and give them full access to his judicial file, if any;
- b) implement the necessary measures so that the beneficiary can carry out his union leadership activities without being subjected to threats, harassment, intimidation, or acts of violence; and
- c) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

30. 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.

31. 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.

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

33. Approved on December 21, 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