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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 1/2026**

Precautionary Measure No. 1904-25

**Fernando Enrique Orozco Cassiani, his family unit, and Carolina Briceño  
regarding Venezuela**

January 9, 2026

Original: Spanish

**I. INTRODUCTION**

1. On December 17, 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 Federico José Lamedá Meléndez (“the applicant” or “the requesting party”) urging the Commission to request that the Bolivarian Republic of Venezuela (the “State” or “Venezuela”) adopt the necessary measures to protect the rights of Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, Luz María Cassiani Villa, and Carolina Briceño (“the proposed beneficiaries”). According to the request, Fernando Enrique Orozco Cassiani is a former representative of the National Assembly. On November 25, he, his wife, his son, and his former partner were reportedly detained by state officials, and their whereabouts have been unknown since then. His mother was allegedly threatened by these state officials as well.

2. The Commission requested additional information from the applicant on December 19, 2025, and received a response on December 20 and 26, 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 December 29, 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 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 Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, Luz María Cassiani Villa, and Carolina Briceño; b) report whether Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño are in the custody of the State and, if so, indicate the place, reason, and circumstances of their detention; or, the measures taken to determine their whereabouts or fate; c) if they are in the custody of the State, implement sufficient measures to ensure that the detention conditions of Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño 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 Luz María Cassiani Villa is not subjected to threats, harassment, intimidation or acts of violence; and e) 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. The proposed beneficiaries are as follows: (1) Fernando Enrique Orozco Cassiani, 63 years old, former representative of the Venezuelan National Assembly; (2) his wife, Dilia Margarita Castillo Jiménez de Orozco, 62 years old, retired former public official of the National Assembly; (3) his son, Brayant Fernando Orozco Castillo, 36 years old; (4) his mother, Luz María Cassiani Villa, 87 years old; and (5) his former partner, Carolina Briceño, 50 years old.

5. On November 25, 2025, at around 9:00 p.m., an operation carried out by members of the Strategic Intelligence Directorate (*Dirección de Inteligencia Estratégica*, DIE) of Charallave and the Directorate Against Organized Crime (*Dirección Contra la Delincuencia Organizada*, DCDO) of the Venezuelan Bolivarian National Police (*Policía Nacional Bolivariana venezolana*, PNB) of Caracas allegedly entered the residence of Dilia Castillo de Orozco and Brayant Orozco, located in Charallave, in the state of Miranda, without a warrant and without justification, using force and in parallel with the residence of Carolina Briceño, in Cúa, also in the state of Miranda. According to witnesses, the officers were hooded, dressed in black, and carrying weapons. It was alleged that the officers subjected Dilia Castillo de Orozco, Brayant Orozco, and Carolina Briceño to violence and forced them to hand over the keys to their vehicles, seizing them and other valuables. The applicant described these acts as “theft.” Dilia Castillo de Orozco, Brayant Orozco, and Carolina Briceño were subsequently taken into the vans that were used in the operation.

6. The applicant warns that unofficial sources indicated that on the night of November 25, 2025, Fernando Enrique Orozco Cassiani was allegedly detained, beaten, and transferred to a prison in Caracas and that he showed signs of torture and injuries to his face. His vehicle was also allegedly stolen. His family members immediately went to the location, but Venezuelan government officials denied that he was being held there. Since then, his whereabouts have been unknown. The applicant described the situation as an “enforced disappearance.”

7. In addition, it was revealed that officials went to the residence of Luz María Cassiani Villa, who has Alzheimer’s disease. Regarding this proposed beneficiary, the request specified that on November 25, 2025, she was locked in a room in her residence with her caregiver, and officials took kitchen items, clothing, and footwear. Although they were not detained, state agents reportedly returned days later and forced them to leave the house. Authorities allegedly told them that the property belonged to the Venezuelan state and that “if they spoke out, they would come back to detain them.”

8. In addition, the request specified that Dilia Margarita Castillo Jiménez de Orozco has heart failure with ventricular arrhythmias, which requires her to take carvedilol, losartan, cardipyrin, rosuvastatin, an anticoagulant, and potassium diclofenac. A medical report prepared on June 20, 2025, by the Cardiovascular Foundation was attached, highlighting that she has “ventricular arrhythmia with ventricular fibrillation” and warning that “the risks of not treating cardiac arrhythmia are: 1. Cardiac arrest; 2. Heart failure; 3. [Stroke]”. For her part, Carolina Briceño has asthma and high blood pressure, and therefore requires losartan, hydrochlorothiazide, and a bronchodilator inhaler. It was noted that Dilia Margarita Castillo Jiménez de Orozco and Carolina Briceño cannot survive without ongoing treatment and medical supervision.

9. The applicant emphasized that the relatives have not received any calls or information regarding the location of the proposed beneficiaries. It was reported that they have visited various detention centers, namely:

- a. On November 26, 2025, they went to the headquarters of the PNB of the Valles del Tuy – Charallave axis; El Helicoide in Caracas; and La Quebradita in Caracas. The officials stated that the proposed beneficiaries were not being held in those locations.
- b. On November 27, 2025, their relatives went to the headquarters of the PNB in Zone 7, Boleíta and Yaguara, in Caracas. The agents reiterated that the proposed beneficiaries were not being held there.
- c. On November 28, 2025, they went to the PNB headquarters in Maripérez and La Quebradita. The officials stated: “They’re not here, don’t insist.”
- d. On November 29 and 30, as well as December 1, 2, 5, and 6, 2025, the relatives went to the PNB headquarters in La Quebradita. The officers did not provide any information, but they received food, clothing, and personal hygiene items. On December 7, 2025, the officers stated: “They are no longer here.” On December 8, 2025, the relatives returned to La Quebradita, but the officials reiterated: “They have been transferred, they are not being held here.”
- e. On December 3, 2025, the relatives filed a complaint regarding the “enforced disappearance” of the proposed beneficiaries with the Ombudsperson’s Office and the Office of the Attorney General. At both the offices, the authorities told them to “wait 20 to 30 business days for a response.”
- f. On December 4, 2025, the family members went to the Public Defense Coordination Court, where the authorities told them that “no public defender has been appointed [to the proposed beneficiaries] because they have not been presented.”
- g. On December 8 and 9, 2025, family members visited El Helicoide, but they did not receive a response.
- h. On December 15, 2025, they went to the PNB headquarters in Boleíta, but received no response.
- i. On December 17, 2025, they went to the PNB headquarters in Zone 7, where officials told them, “They are not here; the political prisoners have already been transferred.”
- j. On December 18, 2025, the family members returned to visit the Ombudsperson’s Office, where they were told: “Your request is being processed, you have to wait.” Meanwhile, the Office of the Attorney General emphasized: “It is already in process; you have to wait until they call you or come back in January.”
- k. On December 19, 2025, the relatives attended the Palace of Justice of the Anti-Terrorism Courts, where they were told that “they have not been presented.” In addition, officials reportedly warned that “the PNB always does the same thing: they take them away, hold them captive, and never bring them before the courts.”
- l. On December 19, 2025, the relatives returned to visit La Quebradita. The officers did not provide any information, but they received food and medicine.

10. Family members suspect that the proposed beneficiaries may be at the PNB La Quebradita headquarters, as this is the only location where they received medicine, clothing, and food until December 19, 2025. However, family members are not certain that they are being held there. Moreover, the applicant stated that since November 25, 2025, the relatives have been living in a state of constant “terror”. In that context, Fernando Enrique Orozco Cassiani’s children allegedly had to leave their residences with their families. It was reported that they are desperate to learn about proposed beneficiaries’ whereabouts and health, as well as the safety and well-being of the entire family.

## **B. Response from the State**

11. The IACHR requested information from the State on December 29, 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**

12. 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.

13. 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>1</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>2</sup> 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.<sup>3</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>4</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.

14. 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>5</sup> 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

<sup>1</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>2</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>3</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>4</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).

<sup>5</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.

of rights enshrined in the American Convention or other applicable instruments.<sup>6</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>7</sup>

15. By the same token, in understanding the facts alleged by the applicant, 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,<sup>8</sup> 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.”<sup>9</sup> 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 time limit, no matter how short, for an enforced disappearance to occur.”<sup>10</sup>

16. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,<sup>11</sup> 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.

17. 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.<sup>12</sup> The strategy of detention and criminalization appears to be specifically targeted at individuals perceived as opponents of the regime, including journalists, opposition leaders, human rights defenders, and others.<sup>13</sup> 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 as “arbitrary arrests of opponents, human rights defenders, and social leaders,”<sup>14</sup> while using “terror as a tool of social control.”<sup>15</sup>

18. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.<sup>16</sup> The IACHR identified that relatives have not yet been formally notified of the detention center where their loved ones are held.<sup>17</sup> In other cases, they have only been able to find out that they

<sup>6</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>7</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>8</sup> [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](#).

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

<sup>10</sup> 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.

<sup>11</sup> IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, para. 1.

<sup>12</sup> IACHR, [Press Release No. 184/24](#), IACHR and SRFoE condemn State terrorism practices in Venezuela, August 15, 2024.

<sup>13</sup> IACHR, Press Release No. 184/24, previously cited; IACHR, [Press Release No. 159/24](#), IACHR Urges Venezuela to End Political Persecution and to Enable Free Elections, July 8, 2024.

<sup>14</sup> IACHR, Venezuela: Serious Human Rights Violations in Connection with the Elections, OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

<sup>15</sup> IACHR, Venezuela: Serious Human Rights Violations in Connection with the Elections, previously cited, para. 5.

<sup>16</sup> 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.

<sup>17</sup> IACHR, Press Release No. 72/25, previously cited.



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 that they send medicine or collect dirty laundry.<sup>18</sup>

19. 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.<sup>19</sup>

20. 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.<sup>20</sup> 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.<sup>21</sup> However, in most cases, the consulted authorities denied having the detainees in their custody, even though they were actually detained under their authority.<sup>22</sup>

21. The Mission determined that, not only are the security forces that proceed with the detentions 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 writs of habeas corpus, and the omission in the performance of its functions of the Ombudsperson's Office.<sup>23</sup> It warned that all these actors are part of the repressive machinery of the State that act in a coordinated manner.<sup>24</sup> 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 well as threats to harm the family members of detainees.<sup>25</sup> 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.<sup>26</sup>

22. 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

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<sup>18</sup> IACHR, Press Release No. 72/25, previously cited.

<sup>19</sup> IACHR, [Press Release No. 50/25](#), IACHR concludes the 192nd Period of Sessions after holding 32 hearings on human rights, March 7, 2025.

<sup>20</sup> 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.

<sup>21</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 267.

<sup>22</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 267.

<sup>23</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 277.

<sup>24</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 277.

<sup>25</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 308.

<sup>26</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 116.

those perceived as such.<sup>27</sup> 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.<sup>28</sup>

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

24. 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 identifies the following:

- a. Fernando Enrique Orozco Cassiani was a member of the National Assembly and, according to publicly available information, in 2019 Nicolás Maduro had him “detained for treason, conspiracy to commit assassination, and terrorism”;<sup>29</sup> as a result, the proposed beneficiary remained in hiding.<sup>30</sup> The IACHR notes with concern that, according to reports, the proposed beneficiary was detained, beaten, and transferred to a prison in Caracas and showed signs of torture and injuries to his face. Furthermore, his whereabouts have been unknown since November 25, 2025, and there is no information regarding whether he received medical attention or about his current health.
- b. In addition, the Commission observes that the events described in the request reportedly impacted his immediate family and his former partner, Carolina Briceño. Along these lines, it was reported that armed state officials dressed in black detained Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño, using force and without a warrant. These events are consistent with patterns documented by the Commission<sup>31</sup> and other international organizations in which state actions are directed not only against opponents or those perceived as such, but also against their family members.<sup>32</sup>
- c. Following their detention, the Commission notes that more than a month has passed without any information regarding their whereabouts, legal status, health, or formal record of their detention. The applicant described the situation as an “enforced disappearance.” Although agents at the PNB La Quebradita headquarters are reportedly receiving medicine, clothing, and food, family members are unsure whether the proposed beneficiaries are actually there, given the lack of response from public officials.
- d. Furthermore, as noted, when being detained, officials took the vehicles and valuables belonging to the proposed beneficiaries, which the request referred to as “theft.” There is no information that any judicial authority authorized or supervised the search of the proposed beneficiaries’ residences, or the seizure of their belongings.
- e. The Commission is concerned that, on November 25, 2025, Luz María Cassiani Villa, an elderly person, was allegedly locked in a room in her residence with her caregiver, and that

<sup>27</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, paras. 296-297.

<sup>28</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 303.

<sup>29</sup> *Diario Contraste Noticias*, [El Dgcm persecutes former Chavista representative Fernando Orozco and ransacks his residence](#), December 14, 2019 (Available only in Spanish).

<sup>30</sup> *Correo del Caroní*, [Disappearance of the family of the leader of Voluntad Popular Fernando Orozco is denounced](#), November 26, 2025.

<sup>31</sup> IACHR, Venezuela: Serious Human Rights Violations in Connection with the Elections, previously cited.

<sup>32</sup> United Nations Human Rights Council, [Detailed conclusions of the independent international fact-finding mission on the Bolivarian Republic of Venezuela](#), previously cited, para. 116.

officials took her belongings. In addition, it was highlighted that, days later, state agents returned to force them out of the residence, threatening that “if they spoke out, they would come back to detain them.”

- f. Regarding their health issues, it was indicated that Dilia Margarita Castillo Jiménez de Orozco has heart failure with ventricular arrhythmias, while Carolina Briceño has asthma and high blood pressure, meaning that both require specific medical treatment. However, to date, the proposed beneficiaries’ current health is unknown, as is whether they underwent medical evaluation after their detention or whether they are receiving adequate medical care and the medications prescribed for their health issues.
- g. The situation of Fernando Enrique Orozco Cassiani (63 years old), Dilia Margarita Castillo Jiménez de Orozco (62 years old), and Luz María Cassiani Villa (87 years old) is particularly serious, as they are senior citizens. In this sense, the Inter-American Court considers age as a factor to take into account, as it demands special protection measures in view of the life cycle and the risk factors associated with aging.<sup>33</sup> The Court has also emphasized that older individuals face particular vulnerability in terms of access to health care due to various factors such as physical limitations, mobility problems, economic conditions, severity of illness, and chances of recovery. Therefore, it has emphasized the need to provide older adults with clear and understandable information about their diagnosis or specific situation, as well as the measures or treatments available to address their issue.<sup>34</sup> Consequently, the Court has determined that they are entitled to reinforced protection that requires the adoption of differentiated measures,<sup>35</sup> and therefore, as members of a vulnerable or high-risk group.<sup>36</sup>
- h. The Commission notes that family members have taken various steps with the national authorities in order to determine the proposed beneficiaries’ whereabouts. In particular, it was reported that they continuously visited various PNB headquarters, including La Quebradita, El Helicoide, Boleíta, Zona 7, Yaguara, Maripérez, and the Valles del Tuy axis, where the authorities denied that the proposed beneficiaries were being held in those locations.
- i. In addition, relatives also filed complaints regarding the “enforced disappearance” of the proposed beneficiaries with the Ombudsperson’s Office and the Office of the Attorney General. Furthermore, they took steps with the judiciary to find out whether they had been brought before a court or had been assigned a public defender. However, despite efforts, to date, the relatives have not received a response.
- j. In this regard, it is concerning that none of the Venezuelan authorities have provided any details about the situation of Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño. For example: their detention conditions; the criminal offense for which they are being investigated; the competent court that reportedly hears the criminal case; the criminal case number; the existence of court orders to detain them and transfer them to a prison; their exact current location; and their health.

<sup>33</sup> 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.

<sup>34</sup> I/A Court H.R., [Case of Poblete Vilches et al. v. Chile](#), Merits, Reparations, and Costs, Judgment of March 8, 2018, Series C No. 349, para. 131.

<sup>35</sup> I/A Court H.R., [Case of Poblete Vilches et al. v. Chile](#), previously cited, para. 127.

<sup>36</sup> 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.



- k. Under the circumstances described above, the Commission finds that the internal actions taken by family members on behalf of the proposed beneficiaries have not been effective, thereby leaving them in a state of absolute defenselessness. Therefore, while this situation persists, the Commission considers that they are completely unprotected against the risks they may be facing in Venezuela.

25. Given the current situation of Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño, the Commission recalls that, in accordance with inter-American standards, the State is obligated to maintain an up-to-date record of detentions, promptly provide information on the whereabouts of individuals and their state of health, and, if individuals are in State custody, bring them before the competent judicial authority within the legal time limits and with due respect for judicial guarantees at all times.<sup>37</sup> The IACHR also highlights that every detained person has the right to maintain personal and direct contact, through periodic visits, with family members, legal representatives, and other persons.<sup>38</sup>

26. 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 by the applicant, nor to assess whether the alleged risk has been addressed or mitigated.

27. 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.

28. With regard to the requirement of *urgency*, the Commission considers it to be met, insofar as the whereabouts of Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño remain unknown, and given the passage of time, the possibility of harm to their rights increases. In addition to the above, it has been identified that, despite search efforts and complaints filed by family members, internal authorities have not provided any response regarding their whereabouts nor have they offered any information regarding their detention conditions or health since the moment of their apprehension. In the case of Luz María Cassiani Villa, the Commission observes that the presence of state officials at her residence and the threats against her indicate a situation that places her at a risk that could materialize at any time in the current context of the country. 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 beneficiaries. Therefore, it is necessary to immediately adopt measures to safeguard their rights to life, personal integrity, and health.

29. 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**

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<sup>37</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 86.

<sup>38</sup> 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.

30. The Commission declares the following as the beneficiaries of these precautionary measures: (1) Fernando Enrique Orozco Cassiani, (2) Dilia Margarita Castillo Jiménez de Orozco, (3) Brayant Fernando Orozco Castillo, (4) Luz María Cassiani Villa, and (5) Carolina Briceño. These individuals are duly identified in this procedure.

## **V. DECISION**

31. 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 Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, Luz María Cassiani Villa, and Carolina Briceño;
- b) report whether Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño are in the custody of the State and, if so, indicate the place, reason, and circumstances of their detention; or, the measures taken to determine their whereabouts or fate;
- c) if they are in the custody of the State, implement sufficient measures to ensure that the detention conditions of Fernando Enrique Orozco Cassiani, Dilia Margarita Castillo Jiménez de Orozco, Brayant Fernando Orozco Castillo, and Carolina Briceño 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 Luz María Cassiani Villa is not subjected to threats, harassment, intimidation or acts of violence; and
- e) 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.

32. 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.

33. 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.

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

35. Approved on January 9, 2026, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Edgar Stuardo Ralón Orellana, Second Vice-President; Gloria Monique de Mees; Riyad Insanally; Marion Bethel; and Rosa María Payá Acevedo, members of the IACHR.

María Claudia Pulido  
Assistant Executive Secretary