

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS**  
**RESOLUTION 8/2026**

Precautionary Measure No. 440-25

Andreina Baduel and Margareth Baduel regarding Venezuela

January 25, 2026

(Follow-up and Extension)

Original: Spanish

**I. INTRODUCTION**

1. On December 1 and 22, 2025, the Inter-American Commission on Human Rights ("the Inter-American Commission," "the Commission" or "the IACtHR") received a request for extension of precautionary measures filed by the organization *Defiende Venezuela*, urging the IACtHR to request that the Bolivarian Republic of Venezuela ("Venezuela" or "the State") protect the rights of Margareth Fabianna Baduel Oyoque. According to the request, Margareth Baduel is the sister of the beneficiary, Andreina Baduel, and is allegedly being harassed and threatened as a result of her work as a human rights defender.

2. Upon analyzing the available information, in light of the applicable context, the Commission understands that the risk that Margareth Fabianna Baduel Oyoque faces is related to these precautionary measures; and that her rights to life and personal integrity are *prima facie* in a situation presenting a serious and urgent risk of irreparable harm, under the terms of Article 25 of the Rules of Procedure, and decided the following:

- a) Continue to monitor the situation of Andreina Baduel, in accordance with Resolution No. 44/2025;
- b) Extend the precautionary measures in favor of Margareth Fabianna Baduel Oyoque and require that the State:
  - i. adopt the necessary measures to protect the rights to life and personal integrity of Margareth Fabianna Baduel Oyoque;
  - ii. ensure that the appropriate measures are taken to guarantee that the beneficiary can continue to carry out her human rights defense activities without being subjected to threats, harassment, or acts of violence in the exercise thereof. In particular, the State must ensure that state actors respect the beneficiary's rights and personal integrity in accordance with the standards established by international human rights law, and in relation to acts of risk attributable to third parties;
  - iii. consult and agree upon the measures to be adopted with the beneficiary and her representation; and
  - iv. report on the actions taken to investigate the alleged facts that led to this extension of the precautionary measures, so as to prevent such events from reoccurring.

**II. BACKGROUND INFORMATION**

3. On June 12, 2025, the IACtHR granted precautionary measures in favor of Andreina Baduel, upon considering that she was in a serious and urgent situation posing a risk of irreparable harm to her rights in Venezuela. It was alleged that the beneficiary is a human rights defender and director of the Committee for the Freedom of Political Prisoners in Venezuela (*Comité de Familiares y Amigos por la Libertad de los Presos Políticos*, CLIPPVE) in Venezuela and was being subjected to threats, harassment, intimidation, and surveillance by state agents. In accordance with Article 25 of the Rules of Procedure, the Commission requested that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Andreina Baduel;

- b) implement the corresponding measures to guarantee that Andreina Baduel can continue to carry out her activities in defense of human rights without being subjected to threats, harassment, or acts of violence in the exercise of these activities. In particular, the State must ensure that state agents respect the beneficiary's rights and personal integrity in accordance with the standards established by international human rights law, and in relation to acts of risk attributable to third parties;
- c) consult and agree upon the measures to be adopted with the beneficiary and her representation; and
- d) report on the actions taken to investigate the alleged events that led to this resolution, so as to prevent them from reoccurring.<sup>1</sup>

4. The organization *Defiende Venezuela* exerts representation in these precautionary measures.

### **III. SUMMARY OF INFORMATION PROVIDED BY THE REPRESENTATION FOLLOWING THE GRANTING OF THE PRECAUTIONARY MEASURES**

5. After the precautionary measures were granted, the Commission has continued to monitor and follow up on this matter by requesting information to the parties under the terms of Article 25(10) of its Rules of Procedure. The details of the dates of information submitted and requested are as follows:

| State                    | Representation                      | From the IACtHR                                |
|--------------------------|-------------------------------------|--|
| No information submitted | October 23; December 1 and 22, 2025 | September 25, October 27 and December 17, 2025 |

6. In its communications from December 1 and 22, 2025, the representation requested to extend the precautionary measures. No response has been received from the State of Venezuela, despite various requests for information.

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

7. The representation denounced the State's failure to comply with precautionary measures to protect the life and personal integrity of Andreina Baduel. On the contrary, they stated the threat against her has intensified and has extended to her sister, Margareth Baduel, who is also a member of CLIPPVE. The representation reported the following events:

- a. On June 18, 2025, during a CLIPPVE press conference to denounce the critical health condition of 60 people deprived of liberty for political reasons at the Faculty of Legal and Political Sciences of the Central University of Venezuela (*Universidad Central de Venezuela*, UCV), an undercover Bolivarian National Police (*Policía Nacional Bolivariana*, PNB) officer was observed posing as a student. After being confronted, the individual admitted that he was a member of the PNB, but refused to leave. The individual stayed and continued to watch and loiter in an intimidating manner during the press conference and a psychological support workshop for relatives of political prisoners. In addition to other members of CLIPPVE, Andreina and Margareth Baduel were present.

<sup>1</sup> IACtHR, [Resolution No. 44/2025](#), Precautionary Measures No. 440-25, Andreina Baduel, regarding Venezuela, June 12, 2025.

- b. On June 25, 2025, Andreina Baduel was preparing to attend a CLIPPVE event when, upon leaving her residence, she encountered several silver Toyota Fortuner SUVs without license plates, which were similar to the vehicles used by state security forces. Vehicles circled the area all day. The representation added that, after receiving official notification of the granting of precautionary measures on June 18, 2025, they began to spot unidentified vehicles and irregular patrols near the residence. Officials from the Scientific, Penal, and Criminal Investigations Corps (*Cuerpo de Investigaciones Científicas, Penales y Criminalística, CICPC*) stated that it was a security operation. However, the family had not received any formal notification of protective measures in favor of Andreina and, on the contrary, the deployment had been an alleged act of intimidation. The surveillance has been reported as persistent. On several occasions, 10 or more vehicles have gathered in front of the family residence and proceeded to turn on their lights and sirens in an attempt to intimidate the family. The residence is owned by the mother and serves as the home of Andreina Baduel and other relatives; it is also frequently visited by Margareth Baduel.
- c. On June 25, 2025, after dropping Andreina off at her residence, Margareth was followed by individuals on a motorcycle, who recorded her with their phones and intimidated her. After confronting them, the individuals fled. However, they started to follow her again a few blocks away.
- d. On July 11, 2025, Margareth Baduel went to El Rodeo 1 prison to visit her brother who is reportedly held for political reasons. Despite complying with the protocols, upon arriving at the facility, she was informed that her brother's visits had been suspended, at that time, indefinitely, without formal explanation, legal basis, or prior notification. They also informed her that the packages she was responsible for providing, such as food, water, hygiene items, and clothing, could only be delivered through a third party, such as a relative of another detainee. The suspension lasted more than a month.
- e. Between September 15 and 19, 2025, they visited embassies in Caracas to raise awareness of the situation of people detained for political reasons. At all times, they saw officials wearing PNB insignia and others dressed in civilian clothes who were recording and photographing attendees with cell phones. At the same time, other individuals were watching from corners and adjacent streets on motorcycles and vehicles without license plates, which created an intimidating atmosphere. Within the framework of the above, they denounced two particular facts:
  - i. On September 18, 2025, after leaving a meeting at the German embassy, Andreina Baduel was pursued by an unidentified individual riding a KLR motorcycle without license plates. She had to return to the embassy to take shelter for several hours due to the fear the situation caused her.
  - ii. On September 19, 2025, at the conclusion of an event at the Italian Embassy, Margareth Baduel detected a tracking device attached to the exhaust pipe of her vehicle. GNP agents present described the situation as dangerous and ordered the area to be evacuated. However, they left an hour later without giving any explanation, filing a report, or securing the scene. Later, two officers from the Strategic Intelligence Directorate (*Dirección de Inteligencia Estratégica, DIE*) arrived, removed the device, and left without providing any explanation, despite being asked about its origin and purpose. Officials suggested "that the device had been placed there by the family members themselves."
- f. On October 5, 2025, while a mass was being celebrated as part of a campaign called "Canonization Without Political Prisoners," armed groups operating outside the law, known as *colectivos*, stormed the venue to intimidate family members and advocates who were

present. The representation indicated that they shouted insults and threats and took photographs and videos of CLIPPVE members, including Andreina and Margareth. PNB officials took photographs and videos of the participants, but showed tolerance for the violent acts of the *colectivos*.

- g. On October 11, 2025, after a vigil in which Andreina and Margareth participated, they were followed while returning home. That night, they learned that a sand-colored Jeep Cherokee with license plates had entered Margareth's building parking lot in an arbitrary and violent manner. The occupants of the vehicle threatened the security guard with firearms in order to force him to grant them access to the basement. At the scene, they went to Margareth's vehicle, forced open the gas pump cap, tampered with the security system, and introduced an unknown substance. Andreina left around 3:00 a.m. in another vehicle, as she had a scheduled trip. Later, Margareth drove off in her vehicle without knowing it had been tampered with, and it began to malfunction after approximately three kilometers; however, she managed to stop without losing control. The presence of foreign substance residue near the fuel tank was detected only after the vehicle was examined by a mechanic. After that incident, in an attempt to clarify the facts, they spoke with the security personnel, and the guard informed them of the events. He also admitted that he had concealed the incident out of fear after being threatened at gunpoint by three individuals. Margareth Baduel went to the CICPC to report the incident, but officials refused to open an investigation, claiming that "no crime had been committed," despite the fact that the vehicle has been tampered with, along with the entry and threats made by armed individuals. On October 15, 2025, Margareth went to the Public Prosecutor's Office to file a complaint and request protective measures, but received no response.
- h. On October 25, 2025, during a mass at the UCV where Andreina and Margareth were present, along with other members of CLIPPVE, around 12 individuals from pro-government groups disrupted the event by posing as parishioners. They physically and verbally assaulted relatives of political prisoners and individuals attending mass, which had been called as a peaceful act of prayer for the freedom, health, and rights of people detained for political reasons in Venezuela. The representation stated that these individuals beat and insulted attendees and members of CLIPPVE and stole their belongings, and that it was possible to corroborate the identity of the aggressors as members of *colectivos*. Intelligence officials were also observed photographing and recording parishioners attending mass.

8. On December 22, 2025, the representation denounced the continued irregular surveillance of the family's residence. This surveillance allegedly included constant and rotating stationing of state security officials in official and unmarked vehicles who monitor the property and record the entry and exit of persons. No official measures have been notified to the beneficiary, and they therefore do not consider it protection, but rather surveillance and intimidation. The representation referred to the persistent harassment of Andreina and Margareth Baduel during activities in which they have participated, during which uniformed and plainclothes officials take photographs and videos of them. The representation specified that they noticed these activities on the following dates: on November 18, 2025, at a rally at the headquarters of the Public Prosecutor's Office; on November 25, 2025, at a rally in front of the United Nations headquarters in Caracas; on December 14, 2025, at a rally in Plaza Bolívar; and on December 15, 2025, at a meeting with relatives of political prisoners.

**b. Response from the State**

9. The Commission requested information from the State on September 25, October 27, and December 17, 2025. To date, no response has been received from the State on the implementation of the precautionary measures or on the request for extension. All deadlines granted to the State have since expired.

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

10. The precautionary measures mechanism is part of the Commission's functions of overseeing compliance with the human rights obligations established in Article 106 of the Charter of the Organization of American States. These general oversight functions are provided for in Article 41 (b) of the American Convention on Human Rights, as well as in Article 18 (b) of the Statute of the IACtHR; while the mechanism of precautionary measures is set forth in Article 25 of the Commission's Rules of Procedure. In accordance with this Article, the IACtHR grants precautionary measures in urgent and serious situations in which these measures are necessary to avoid irreparable harm to persons or to the subject matter of a petition or case before the organs of the inter-American system.

11. 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>2</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and protect the exercise of human rights.<sup>3</sup> To do this, the IACtHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and the vulnerability to which the persons proposed as beneficiaries would be exposed if the measures are not adopted.<sup>4</sup> Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under study by the organs of the inter-American system. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations. In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

- 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.

12. 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 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

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

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 resolved without making any determination on the merits.<sup>7</sup>

13. On this occasion, the Commission decides to issue a *Follow-up and Extension Resolution* considering the information received, in light of the current situation. In this regard, the Commission will conduct its analysis as follows: i) Lack of a response from the State in this matter; ii) Current context in Venezuela; iii) Ongoing risk in light of Article 25 of the IACtHR Rules of Procedure; and iv) Request for extension in favor of Margareth Fabianna Baduel Oyoque.

**(i) Lack of response from the State in this matter**

14. The Commission has not received official information from the State on the actions which are reportedly being adopted to implement these precautionary measures. Despite requests for information sent to the State on September 25, October 27, and December 17, 2025, the IACtHR has not received a response that includes the aforementioned information. The Commission regrets the lack of willingness of the State, given that dialogue and agreement are essential for an adequate implementation of precautionary measures and, ultimately, for the protection of the beneficiaries' rights to life and integrity. Without communication from the State, it is impossible to know or acknowledge the possible efforts or progress that the State is making in order to protect the rights of the beneficiary.

15. The Commission emphasizes that, according to the information provided by the representation, the State was constantly aware of the risk that the beneficiary and her sister faced, and that public authorities and officials were even identified as responsible for the acts reported. In addition, the Baduel sisters have continued to file complaints with the competent authorities. Notwithstanding the foregoing, the Commission notes that no protective measures have been adopted in their favor, nor have the alleged acts of harassment, surveillance, and persecution against them ceased.

16. The Commission recalls that, following the Inter-American Court, that the failure of the State to provide full information regarding the measures adopted in compliance with its decisions on international protection measures, such as precautionary measures, is of particular seriousness. This is due to the legal nature of these measures, which aim to prevent irreparable harm to individuals in situations of serious risk and urgency.<sup>8</sup> The duty to inform constitutes a dual obligation that requires, for its effective fulfillment, the formal presentation of a document on time and specific, true, current and detailed material references to the issues on which that obligation falls.<sup>9</sup>

**(ii) Current context in Venezuela**

17. The Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,<sup>10</sup> and has included the country in Chapter IV.B of its Annual Report. The Commission has also issued

<sup>6</sup> IACtHR, [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> I/A Court H.R. [Matter of Communities of Jiguamiandó and Curvaradó regarding Colombia](#), Provisional Measures, Order of February 7, 2006, considerandum 16; [Case of Luisiana Ríos et al. \(Radio Caracas Televisión – RCTV\)](#), Provisional Measures, Order of September 12, 2005, considerandum 17 (Available only in Spanish).

<sup>9</sup> I/A Court H.R. [Matter of Communities of Jiguamiandó and Curvaradó...](#), previously cited; and Case of Luisiana Ríos et al., previously cited.

<sup>10</sup> IACtHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), December 31, 2023, para. 1.

press releases and country reports, and established a special follow-up mechanism for the country, known as MESEVE. In 2023, the Commission observed the persistence of a coordinated repression policy, and recommended that the State of Venezuela refrain from carrying out illegal or arbitrary detentions. In cases where a person is deprived of their liberty, the State should ensure that all due process guarantees are upheld, including prompt presentation before an independent judicial authority, in order to prevent enforced disappearances, torture, and other cruel and inhumane treatment.<sup>11</sup> In turn, the Commission has condemned the practices of institutional violence within the framework of the electoral process in Venezuela in 2024, 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>

18. On August 15, 2024, the IACHR and its Office of the Special Rapporteur for Freedom of Expression (SRFOE, or RELE for its Spanish acronym) stated that the regime in power is sowing terror as a tool to silence the citizenry and perpetuate the ruling authoritarian regime in power, and that Venezuela must cease practices immediately that violate human rights and reestablish democratic order and the rule of law.<sup>14</sup> The IACHR stressed that “[t]he practices of state terrorism perpetrated by the current regime and observed by the Commission are not only aimed at the persecution of specific sectors, but also generate a climate of fear and intimidation among the Venezuelan population” which “amount also to a denial of the right to political participation.”<sup>15</sup> On December 27, 2024, the IACHR reiterated that the State has been perpetrating “arbitrary detentions of opposition figures, human rights defenders, and social leaders,”<sup>16</sup> having adopted “terror as a tool of social control.”<sup>17</sup> During its 191st Session, the IACHR held a hearing and a press conference where it addressed the widespread human rights violations in Venezuela in the post-election landscape and made an emphatic call on the current regime to end the repression and release those identified as political prisoners.<sup>18</sup>

19. In January 2025, the IACHR condemned the persistence of state terrorism in Venezuela to sow fear and exercise control over the population, calling once again for an end to the persecution of opposition figures, human rights defenders, and journalists.<sup>19</sup> On that occasion, it highlighted the ongoing arbitrary detentions and enforced disappearances carried out by hooded individuals with no visible identification, traveling in vehicles without license plates.<sup>20</sup> In April 2025, the IACHR highlighted that the Venezuelan regime not only arbitrarily punishes opposition figures for legitimately exercising their freedoms of expression, assembly, and association, but also reprimands their family members as a form of punishment.<sup>21</sup> In December 2025, RELE identified the persistence of events that fall within a “broader context of state repression and persecution in Venezuela following the July 2024 presidential elections, marked by arbitrary detentions, enforced disappearances, judicial harassment, censorship, and restrictions on the freedoms of expression, association, and peaceful assembly.”<sup>22</sup>

20. Lastly, on January 13, 2026, the Commission expressed its deep concern about the events related to the armed incursion by the United States into Venezuela and the arrest of Nicolás Maduro and his

<sup>11</sup> IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), previously cited, Recommendation 8.

<sup>12</sup> IACHR, Press Release 184/24, [IACHR and SRFOE condemn State terrorism practices in Venezuela](#), August 15, 2024.

<sup>13</sup> IACHR, Press Release 184/24, previously cited.

<sup>14</sup> IACHR, Press Release 184/24, previously cited.

<sup>15</sup> IACHR, Press Release 184/24, previously cited.

<sup>16</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>17</sup> IACHR, [Venezuela: Serious Human Rights Violations in connection with the Elections](#), previously cited, para. 5.

<sup>18</sup> IACHR, [Venezuela: Crisis of Human Rights and Democracy in the Electoral Context](#), Press Conference of November 12, 2024.

<sup>19</sup> IACHR, Press Release 09/25, [The IACHR condemns the ongoing practices of state terrorism in Venezuela and recalls that María Corina Machado is a beneficiary of precautionary measures](#), January 9, 2025.

<sup>20</sup> IACHR, Press Release 9/25, previously cited.

<sup>21</sup> IACHR, Press Release 72/25, [IACHR urges Venezuela to immediately release political prisoners and to end the practice of holding them incommunicado](#), April 11, 2025.

<sup>22</sup> IACHR, Press Release R284/25, [The SRFOE Warns of Ongoing Violations of Freedom of Expression in Venezuela and Calls on the International Community to Support the IACHR's Request for an On-Site Visit](#), December 29, 2025.

wife, Cilia Flores.<sup>23</sup> On that occasion, the IACHR highlighted that, in the context of these events, journalists were detained, armed groups known as *colectivos* were detected patrolling in various locations, and a decree was issued that “significantly expands the participation of the armed forces in public security tasks and establishes severe restrictions on freedom of expression and democratic participation, including provisions authorizing the search and detention of persons accused of promoting or supporting the events, which increases the risk of human rights violations.”<sup>24</sup>

21. The Commission understands that the context described is relevant for the analysis of the procedural requirements. The above, insofar as they give a special seriousness to the situation facing both the current beneficiary and the proposed beneficiary in Venezuela.

***(iii) Ongoing risk in light of Article 25 of the IACHR Rules of Procedure***

22. At the time the precautionary measures was granted in favor of Andreina Baduel, the Commission took into account her work as a human rights defender through the Committee of Family and Friends for the Freedom of Political Prisoners, where she helps seek justice for persons deprived of liberty considered “political prisoners” in Venezuela, for which she was being threatened and harassed by State officials.<sup>25</sup> Based on the foregoing, the Commission will now proceed to analyze the validity of the risk that Andreina Baduel faces.

- i. First, the IACHR notes that Andreina Baduel continues to work in defense of human rights as director of CLIPPVE. In this regard, it was reported that during the period in which the measures were in force, she carried out activities to support the families of persons deprived of liberty, as well as raised awareness of their situation through campaigns and public events.
- ii. Second, the Commission notes the various acts of harassment and threats that the beneficiary has experienced. In this regard, her residence has been irregularly monitored by state agents, without any formal notification; she has been harassed on several occasions by individuals on motorcycles who have filmed and intimidated her, which even forced her to seek refuge in diplomatic premises; and in the course of her activities with CLIPPVE, she has been the target of acts of violence by so-called *colectivos* or undercover state agents.
- iii. Third, it has been reported that the harassment has extended to her family unit, through acts of violence directed at her sister, Margareth Baduel, as well as harassment and surveillance of the family residence, where various relatives live. In addition, the Commission observes the alleged restrictions on visits to her brother who is deprived of liberty, which was reported in the context of these proceedings as possible retaliation.
- iv. Fourth, there is a noticeable lack of implementation of protective measures. On this point, it is relevant to note the direct involvement of state agents in the reported events, who, instead of protecting the beneficiary, allegedly carried out acts to harass and intimidate. There is no information to suggest that any investigation has been opened to determine responsibility or provide protection. Moreover, it has been noted that, in instances where acts of violence were perpetrated by civilians, state officials were present but did not intervene to stop the acts. In this context, the Commission lacks information on the adoption or implementation of measures to protect the beneficiaries or the advancement of investigations to clarify the facts against them, and they therefore remain in a state of lack of protection.

<sup>23</sup> IACHR, Press Release 7/26, [IACHR expresses concern over armed incursion in Venezuela, calls for respect for international law, and the end of repression](#), January 13, 2026.

<sup>24</sup> IACHR, Press Release 7/26, previously cited.

<sup>25</sup> IACHR, Resolution No. 44/2025, previously cited.

23. The Commission notes that the allegations that the representation submitted have been consistent with the context that the IACtHR has been observing in its monitoring of Venezuela, particularly in light of the beneficiary's work in defending human rights in relation to the situation of persons deprived of liberty in Venezuela.

24. Consequently, considering the information provided, which reports the persistence of harassment, threats, and other acts of violence against the beneficiary, the Commission finds that the risk she faces continues. It also highlights the increase in intensity after the measures were granted and as a result of her ongoing work in defense of human rights. In this context, a situation of seriousness, urgency, and the need to prevent irreparable harm persists, in light of Article 25 of its IACtHR Rules of Procedure.

**(iv) Request for extension in favor of Margareth Fabianna Baduel Oyoque**

25. The Commission recalls that a requirement to extend precautionary measures is that the facts alleged have a "factual connection" with the events that justified the initial adoption of the precautionary measures.<sup>26</sup> In this regard, the Commission finds that this requirement has been met. First, the family relationship between Margareth Baduel and the beneficiary is highlighted, as they are sisters. Second, both individuals reportedly perform advocacy work through the same organization, the Committee of Family and Friends for the Freedom of Political Prisoners. Lastly, the available information reveals that the events Andreina Baduel has faced are related to the acts experienced by her sister Margareth Baduel. Consequently, the Commission proceeds to analyse the procedural requirements in the light of the information available in the extension request submitted and processed.

26. In analyzing the requirement of *seriousness* in relation to Margareth Baduel, the Commission considers the following elements:

- i. First, like the beneficiary Andreina Baduel, Margareth Baduel works in defense of human rights as a member of CLIPPVE. It highlights her participation in various events, like Andreina, in accompanying the families of people considered political prisoners, as well as raising awareness of their situation through campaigns and public events.
- ii. Secondly, there have been various alleged incidents of harassment, surveillance, and threats against the proposed beneficiary: (i) state agents surveilled the family residence in an irregular manner and, although she did not live at that location, she visited her family often and had reported being surveilled and followed after visiting, as occurred on June 25, 2025, after dropping Andreina off at the residence; (ii) she has also been followed on several occasions by individuals on motorcycles who have filmed and intimidated her; (iii) in the course of their activities with CLIPPVE, both have been subjected to acts of violence by so-called *colectivos* or undercover state agents; (iv) it is worth noting that on September 19, 2025, a device was identified to have been attached to her vehicle while they were at an event at the Italian embassy. No investigation was carried out despite the intervention of state agents. The Commission has already received information about possible surveillance through devices in defenders' vehicles;<sup>27</sup> (v) of particular concern is the incident on October 11, 2025, in which armed individuals allegedly entered the beneficiary's building, threatened the guard, and tampered with the gas tank of the proposed beneficiary's car with an unknown substance, presumably seeking to put her at risk.
- iii. Third, as indicated when analyzing Andreina Baduel's situation, the risk has extended to the family unit. Initially, Andreina Baduel was identified as the target, but the events now directly affect

<sup>26</sup> I/A Court H.R., [Case of Fernández Ortega et al. v. regarding Mexico. Provisional Measures](#), Order of the Inter-American Court of Human Rights of November 23, 2010, considerandum 11 (Available only in Spanish).

<sup>27</sup> IACtHR, [Resolution No. 87/2024](#), Precautionary Measure No. 409-23, Franklin Alfredo Caldera Cordero, Franklin Caldera Martínez and Yuraima Martínez regarding Venezuela (Follow-up, Modification and Extension), November 25, 2024, paras. 7 and 28.ii

Margareth Baduel as well. In addition, they have also reported harassment and surveillance of the family residence, where various family members currently live. In addition, the situation of their incarcerated brother is reiterated. Margareth often visited him, and although she followed the established protocols, she was informed that visits were restricted without explanation or justification and that, at a certain point, she could no longer deliver correspondence.

- i. Fourth, there is a noticeable lack of implementation of protective measures and the opening of investigations. In this regard, the relevance of the direct actions of state agents in the reported events is reaffirmed: instead of protecting the proposed beneficiary, they allegedly carried out acts of harassment and intimidation. Regarding these acts, there is no information indicating that any investigation has been opened to determine responsibilities or provide protection. For their part, it is noted that state agents intervened when a device was identified in Margareth Baduel's vehicle, with no consequences, as they held the family responsible and did not investigate the facts. In addition, after reporting the facts of threats to the security guard who works at their residence and tampering of her vehicle, there was no response. In this context, the Commission lacks information on the adoption or implementation of measures for the protection of the beneficiaries or the progress of the investigations to clarify the facts against them, and they therefore remain in a state of lack of protection.

27. The Commission notes that the arguments that the representation has submitted are consistent with the situation that the IACtHR has been observing in its monitoring and in the processing of other precautionary measures<sup>28</sup> in the post-election context in Venezuela, particularly with regard to the work of defending human rights.

28. Upon requesting information from the State, the Commission regrets the lack of response from the State of Venezuela. Although this is not enough per se to justify the granting of a precautionary measure, it prevents the Commission from obtaining a response that allows it to contrast the allegations. Similarly, the Commission is unable to determine the actions that authorities may be taking to mitigate or address the situation that place the proposed beneficiary at risk. In any case, the Commission expresses particular concern, as state agents, who bear a special responsibility as guarantors of human rights, have been identified as responsible for the events that have harmed the proposed beneficiaries.

29. 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 beneficiary faces a situation of serious risk to her rights to life and personal integrity.

30. With regard to the requirement of *urgency*, the Commission considers that, given the events analyzed, it is possible to acknowledge the existence of an imminent risk. In particular, insofar as the proposed beneficiary continues to carry out her work in defense of human rights, along with her sister, who is also a beneficiary of these measures, both through CLIPPVE. It is noteworthy that the alleged risks have not ceased since the measures were granted and have continued, and the latest was reported on December 15, 2025. The threats issued by state agents, along with the ongoing persecution and harassment of the proposed beneficiary and the break-in at her residence, show a risk that could materialize at any moment if immediate protective measures are not implemented.

31. 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.

<sup>28</sup> See, in general: IACtHR, [Press Release 319/24](#), IACtHR issues urgent alert regarding precautionary measures in the aftermath of the elections in Venezuela, December 17, 2024; and [IACtHR :: Precautionary Measures:: Grants](#)

**V. BENEFICIARY**

32. The Commission declares Margareth Fabianna Baduel Oyoque as the beneficiary, who is duly identified in this proceeding.

**VI. DECISION**

33. The Commission concludes that a situation of risk continues to exist in this matter, and that the requirements of seriousness, urgency, and irreparable harm contained in Article 25 of its Rules of Procedure are *prima facie* present in relation to Andreina Baduel, in the terms indicated throughout this resolution. It also decides to extend the precautionary measures in favor of Margareth Fabianna Baduel Oyoque, the proposed beneficiary's sister, considering that they share the risk covered in these precautionary measures. Therefore, the Commission decided the following:

- a) Continue to monitor the situation of Andreina Baduel, in accordance with Resolution No. 44/2025;
- b) Extend the precautionary measures in favor of Margareth Fabianna Baduel Oyoque and require that the State:
  - i. adopt the necessary measures to protect the rights to life and personal integrity of Margareth Fabianna Baduel Oyoque;
  - ii. ensure that the appropriate measures are taken to guarantee that the beneficiary can continue to carry out her human rights defense activities without being subjected to threats, harassment, or acts of violence in the exercise thereof. In particular, the State must ensure that state actors respect the beneficiary's rights and personal integrity in accordance with the standards established by international human rights law, and in relation to acts of risk attributable to third parties;
  - iii. consult and agree upon the measures to be adopted with the beneficiary and her representation; and
  - iv. report on the actions taken to investigate the alleged facts that led to this extension of the precautionary measures, so as to prevent such events from reoccurring.

34. The Commission decides to continue to carry out the appropriate follow-up measures in terms of Article 25(10) and other provisions of its Rules of Procedure.

35. The Commission requests that Venezuela report within 15 days as from this resolution on the adoption of the required precautionary measures. Moreover, it is requested to submit periodic information on the status of implementation of the precautionary measures. Notwithstanding the foregoing, the representation is requested to continue updating on the risk, as well as any additional information it deems pertinent.

36. The Commission instructs its Executive Secretariat to notify the extension of these precautionary measures to the State of Venezuela and to the representation.

37. Approved on January 25, 2026, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Gloria Monique de Mees; Riyad Insanally; Marion Bethel; and Rosa María Payá Acevedo, members of the IACtHR.

Tania Reneaum Panszi  
Executive Secretary