

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 35/2025**

Precautionary Measure No. 1426-24  
Sairam Gabriela Rivas Moreno regarding Venezuela  
April 24, 2025  
(Extension)  
Original: Spanish

**I. INTRODUCTION**

1. On March 7 and April 1, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received a request for extension of precautionary measures filed by the organization *Defiende Venezuela* urging the IACHR to request that the Bolivarian Republic of Venezuela (“Venezuela” or “the State”) protect the rights of Sairam Gabriela Rivas Moreno. According to the request, Sairam Gabriela is the partner of the beneficiary Jesús Alexander Armas Monasterio, whose official status remains uncertain after being detained by state agents. It has been reported that she is facing harassment and threats due to her work as a human rights defender and her efforts to locate the beneficiary.

2. In accordance with the terms of Article 25 of its Rules of Procedure, the Commission requested information from the State on March 11 and April 7, 2025, in order to make a decision on the request for extension. The IACHR received no response from the State, and the deadlines have since expired.

3. Upon analyzing the information available, in light of the applicable context, the Commission understands that the risk faced by Sairam Gabriela Rivas Moreno is related to these precautionary measures and her rights to life and personal integrity are *prima facie* in a serious and urgent situation presenting a risk of irreparable harm. Consequently, the IACHR decides to extend the precautionary measures in favor of Sairam Gabriela Rivas Moreno and requires that the Bolivarian Republic of Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Sairam Gabriela Rivas Moreno;
- b) implement the corresponding measures to guarantee that the beneficiary can continue to carry out her human rights defense activities without being subject 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;
- c) report on the existing criminal investigations involving her; present any judicial arrest warrants, if applicable; and provide adequate security guarantees during the course of any investigations;
- d) consult and agree upon the measures to be adopted with the beneficiary and her representation; and
- e) report on the actions taken to investigate the alleged facts that led to this extension of the precautionary measure, so as to prevent such events from reoccurring.

**II. BACKGROUND INFORMATION**

4. On December 31, 2024, the IACHR granted precautionary measures in favor of Jesús Alexander Armas Monasterios, in Venezuela. According to the request, state agents detained the beneficiary, a former Caracas councilman, political activist, and human rights defender, on December 10, 2024, in Caracas, Venezuela, and there has been no official information provided on his location or detention conditions. The Commission considered that Jesús Alexander Armas Monasterios was in a serious and urgent situation, given that his rights were at risk of irreparable harm. Therefore, pursuant to Article 25 of its Rules of Procedure, it required that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Jesús Alexander Armas Monasterios. In particular, officially report whether he is in custody of the State and the circumstances of his detention; or else, the measures taken to determine his whereabouts or fate;
- b) establish the necessary measures to ensure that the beneficiary's detention conditions are compatible with the applicable international standards on the matter, including:
  - i. guaranteeing regular contact with and access to his family members, lawyers, and representatives;
  - ii. officially report on the legal situation of the beneficiary in the framework of the criminal process in which he is said to be involved, as well as the reasons why he has not been released to date or taken before an independent court;
  - iii. immediately carry out a medical evaluation of his health and guarantee access to the necessary medical care;
- c) consult and agree upon the measures to be adopted with the beneficiary and his representatives; and
- d) report on the actions undertaken to investigate the alleged events that led to the adoption of this resolution, so as to prevent them from reoccurring.<sup>1</sup>

### **III. SUMMARY OF THE INFORMATION PROVIDED BY THE REPRESENTATION**

5. Regarding the beneficiary *Jesús Armas*, it has been reported through relatives of other prisoners who have had access to the Bolivarian National Intelligence Service (SEBIN) headquarters at "El Helicoide" that he has been held at this detention center since December 19, 2024. It was reported that the beneficiary has not been able to receive visits from his family members and/or attorneys and is not allowed to appoint attorneys of his own choosing, thus keeping him isolated from outside contact. It was added that, although family members are permitted to deliver food and receive dirty clothes, they do not allow any kind of communication "not even through letters or any other method." According to the information his family members received, it was reported that Jesús Armas shares a cell with eight other people,<sup>2</sup> who are also in solitary confinement and are unable to contact their families. It was also noted that no response has been received to the complaints filed with the Public Prosecutor's Office and the Ombudsperson's Office, and it is understood that no progress has been made in the matter.

6. With regard to *Sairam Gabriela*, the romantic partner of Jesús Armas, it was pointed out that she is a human rights defender and works with Venezuelan civil society. It was highlighted that she has been helping mothers of individuals who are deprived of their liberty who have been subjected to torture and cruel treatment, many of whom come from vulnerable sectors, by denouncing human rights violations. As background, it was reported that she is a former student leader. On May 8, 2014, she was detained while participating in a civic and peaceful protest in Alfredo Sadel Square. She added that she was deprived of her liberty for four months while held in "El Helicoide," where she was not permitted access to sunlight and was kept in a confined space. At that time, she was accused of "incitement to commit a crime, conspiracy, and using minors to commit crimes" and was released under precautionary measures and banned from participating in public events. Over the last two years, she has focused her work on campaigns for the release and justice of union leaders. She is currently involved in activities with the Committee of Family and Friends for the Freedom of Political Prisoners (*Comité de Familiares y Amigos por la Libertad de los Presos Políticos*).

7. It was reported that, on the day before the July 28, 2024 elections, as part of the electoral process, SEBIN officials surrounded Sairam Gabriela's house in Guatire, Zamora municipality. It was reported that the officials spent approximately one hour surrounding the building and taking photographs from the outside, without presenting a court order or official justification. The representation stated that it was "a

<sup>1</sup> IACHR, [Resolution 105/24](#), Precautionary Measure No. 1426-24, Jesús Alexander Armas Monasterios regarding Venezuela, December 31, 2024.

<sup>2</sup> It was detailed that among these individuals are the following: Freddy Superlano, Luis Paloca, Americo de Grazia, Biagio Pilieri, Carlos Azuaje, Alfredo Diaz, and Perkis Rocha.

pattern of surveillance and intimidation against activists and opponents” that caused fear in the proposed beneficiary.

8. After Jesús Armas was detained on December 10, 2024, it was stated that the proposed beneficiary, Sairam Gabriela, searched for him in detention centers, but authorities did not provide any information on his whereabouts or condition. It was added that, due to their sentimental ties, she assumed the leadership in the advocating for his case with activities such as public statements to the media, complaints about procedural irregularities and the presentation of documents and appeals to the competent authorities.

9. The representation referred to the television program “Con el Mazo Dando,” hosted by Diosdado Cabello, current Minister of the Interior, Justice, and Peace. It was indicated that in this program, political opponents, journalists, activists and citizens critical of the government are exposed, stigmatized, and discredited. It was claimed that, since 2017, Diosdado Cabello has used the phrase “Operation Tun Tun” as a way of announcing an upcoming arbitrary detention of government dissidents. In this regard, the following was specified:

- a) On September 11, 2024, Sairam Gabriela and her partner, Jesús Armas, were mentioned on the program, being accused of receiving funding from opposition leader María Corina Machado. Days after they were mentioned, the beneficiary Jesús Armas was detained.
- b) On January 8, 2025, Sairam Gabriela was mentioned again, along with other leaders and “based on information from anonymous sources called cooperating patriots.” According to the video provided, while the host read an anonymous letter, he mentioned the names of opponents from various localities, while tapping the table, which the representation alleged was a reference to “Operation Tun Tun.” The proposed beneficiary was specifically mentioned under the following statement: “by Libertador Sairam Rivas,” [“Libertador” is used to sarcastically belittle Sairam Rivas, mocking her activism by ironically likening her to independence heroes.] An individual who was also mentioned was arrested days later.
- c) According to an attached video, on March 19, 2025, Cabello read a letter in which he claimed that Sairam Rivas was being “slow-cooked” to become an “executive arm” of María Corina Machado. He further stated that “they are positioning her in the media” and associating her with a destabilization strategy. In the program, she referred to her as “la coña” and it was stated that her public visibility has increased due to her relationship with Jesús Armas, as well as that there is a list of people who finance her and some have offices in “the CCT,” while he continued to tap the table. He added that she “had already been imprisoned for terrorism in 2014” and that Jesus Armas is a “terrorist who was imprisoned for laundering money and being one of the political operators of the Guarimba.” It was also said that they use her in the opposition because “they move well in social networks and in the world of so-called human rights NGOs.” The representation considered that this represents a “direct threat” and a possible pretext to justify future repressive actions against her.

10. Lastly, it was reported that SEBIN units have been stationed outside Sairam Rivas’s residence on several occasions (photographs were provided), which she argued amounted to intimidation and threats against her. The representation indicated that given the lack of independence of the judicial system in Venezuela and the history of persecution against activists, no complaints have been filed about these incidents, as this could increase their risk instead of providing her with protective measures.

- *Response from the State*

11. The IACHR has not received a response from the State on the implementation of the precautionary measures. Nor has it received information proving that the State has been adopting measures during the time they have been in force. All deadlines granted to the State have since expired.

#### **IV. 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 (hereinafter "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>3</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>4</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>5</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>6</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>7</sup> Similarly, the Commission recalls that, by its own mandate, it is not called upon to determine any individual

<sup>3</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>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 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>5</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>6</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>7</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.

liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.<sup>8</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>9</sup>

15. To the extent that the representation has requested the “extension” of these precautionary measures, the Commission recalls that one of the requirements is that the alleged facts have a “factual connection” with the events that called for the initial adoption of the precautionary measures.<sup>10</sup> In this regard, the IACHR notes that Sairam Gabriela is the beneficiary’s partner, and they have ties through their romantic relationship. Furthermore, it is noted that Sairam Gabriela has played a role in the search for the beneficiary and in demanding information about his official location and current conditions. Therefore, considering that this situation motivated the granting of precautionary measures, a link is also established with the facts that justified their adoption. Additionally, mention is made of the program ‘Con el Mazo Dando,’ where statements directed at him have been directly linked to the situation of the current beneficiary. Due to the aforementioned facts, the Commission considers that the “factual connection” requirement is met, and proceeds to analyze its situation under the terms of Article 25 of its Rules of Procedure.

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 its 2023 Annual Report, 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>12</sup> In turn, the Commission has condemned the practices of institutional violence within the framework of the electoral process in Venezuela, such as violent repression, arbitrary detentions, and political persecution.<sup>13</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>14</sup>

18. In particular, in the press release of August 15, 2024, the IACHR and its Office of the Special Rapporteur for Freedom of Expression (SRFoE) 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>15</sup> It was found that detainees were subjected to criminal proceedings for crimes defined in ambiguous and broad terms, without the opportunity to be represented by a defense counsel of their choice, as public defenders were

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<sup>8</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>9</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>10</sup> I/A Court H.R., [Case of Fernández Ortega et al. v. Mexico](#), Provisional Measures, Resolution of November 23, 2010, considerandum 11; IACHR, [Resolution 87/2024](#), Precautionary Measures No. 409-23, Franklin Alfredo Caldera Cordero, Franklin Caldera Martínez and Yuraima Martínez regarding Venezuela, November 25, 2024, para. 33.

<sup>11</sup> IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), December 31, 2023, para. 1.

<sup>12</sup> IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), previously cited, Recommendation 8.

<sup>13</sup> IACHR, Press Release 184/24, [IACHR and SRFoE condemn State terrorism practices in Venezuela](#), August 15, 2024.

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

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



imposed on them. 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>16</sup>

19. On December 27, 2024, the IACHR approved the report titled “Venezuela: Serious Human Rights Violations in the Electoral Context” and reaffirmed that the State has been engaging in practices such as the arbitrary detention of opponents, human rights defenders, and social leaders,<sup>17</sup> while using “terror as a tool of social control.”<sup>18</sup> In the framework of its 191st Period of Sessions between November 4 and 15, 2024, the IACHR held a hearing and a press conference where it addressed the generalized situation of human rights violations in Venezuela in the post-electoral context.<sup>19</sup> The IACHR emphatically called on the current regime to put an end to the repression and release those identified as political prisoners.

20. 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.

21. In analyzing the requirement of *seriousness* in relation to Sairam Gabriela Rivas, the Commission weighs the following elements:

- i. The Commission observes the beneficiary’s work and role. As background, it was stated that in 2014, she was participating in peaceful protests when she was detained and taken to “El Helicoide.” This matter was recently revisited on the program “Con el Mazo Dando,” indicating that she was detained for terrorist activities, demonstrating the use of this type of detention in the present day.

It was also mentioned her work as a human rights defender over the last ten years, focusing for the last two years on demanding the release and justice for union leaders situation and working with the Committee of Family and Friends for the Freedom of Political Prisoners. It is noted that, given these activities, Diosdado Cabello stated that she works “in the world of so-called human rights NGOs.” In this regard, the Commission recalls that

the State has the particular duty to protect those people who work in non-governmental organizations, as well as other groups or individuals who work in favor of the defense of human rights, since the work they carry out constitutes a positive and complementary contribution to the efforts made by the State by virtue of its position as guarantor of the rights of the people under its jurisdiction. In this sense, the prevalence of human rights in a democratic state is based, to a large extent, on the respect and freedom afforded to human rights defenders in their work.<sup>20</sup>

- ii. According to the information received, the beneficiary Jesús Armas is currently being held in “El Helicoide,” confined in a cell with eight other individuals, under solitary confinement, and without any official information regarding his precise location or current state. In turn, the complaints filed

<sup>16</sup> IACHR, Press Release 184/24, previously cited.

<sup>17</sup> IACHR, [Venezuela: Serious Human Rights Violations in the Electoral Context](#), OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

<sup>18</sup> IACHR, [Venezuela: Serious Human Rights Violations in the Electoral Context](#), previously cited, para. 5.

<sup>19</sup> IACHR, [Venezuela: Crisis of Human Rights and Democracy in the Electoral Context](#), Press Conference of November 12, 2024 (auto-generated subtitles in English available).

<sup>20</sup> I/A Court H.R., [Matter of Members of the Nicaraguan Center for Human Rights and the Permanent Commission on Human Rights \(CENIDH-CPDH\) regarding Nicaragua](#), Provisional Measures, Resolution of October 14, 2019, considerandum 32 (Available only in Spanish).

- as a result of this situation have not received a response. The IACHR warns that the situation that gave rise to these precautionary measures is ongoing.
- iii. Since the beneficiary was detained, the proposed beneficiary has played a leading role in the defense of his case due to their romantic relationship. In this sense, she has made public statements, issued complaints about procedural irregularities, and presented appeals to the competent authorities. The Commission believes that the actions carried out by the proposed beneficiary in Venezuela have generated wide visibility and exposure to the current government.
  - iv. The Commission expresses its deep concern regarding the references to Sairam Gabriela on September 11, 2024, January 8, and March 19, 2025, during the broadcast of the program “Con el Mazo Dando.” On these occasions, the program’s host, who is also the Minister of Interior, Justice, and Peace, mentioned her using derogatory terms such as “coña” and linked her to an alleged destabilization strategy. She was also portrayed as being funded and profiled as part of the political opposition in the country. The foregoing suggests that the proposed beneficiary is perceived by the ruling party as part of the opposition and as a person of particular interest when referring to the so-called “Operation Tun Tun.” The Commission emphasizes that the mention of individuals’ names on this program is not without consequence; rather, it functions as an implicit threat, signaling what could happen to them should they continue to voice dissent against the government in the current context. For example, it was reported that, after being alluded to in that program along with the beneficiary on September 11, 2024, the beneficiary Jesús Armas was detained days later and to date no official information has been provided on his situation. A similar situation occurred with another individual mentioned along with the beneficiary in the program that aired on January 8, 2025.

The IACHR has received information indicating that the so-called “Operación Tun Tun” refers to the characteristic sound made by agents knocking on doors prior to carrying out the detentions. This operation has been associated with serious human rights violations, including at least 25 extrajudicial killings, dozens of short-term enforced disappearances, approximately 2,000 arbitrary detentions, which included children and adolescents, as well as acts of torture, cruel, inhuman, and degrading treatment, and severe violations of judicial guarantees and freedom of expression.<sup>21</sup> In this regard, information has been received about the mention of the aforementioned “Operation Tun Tun” by high-ranking authorities of the ruling party, such as the president, Nicolás Maduro; the Minister of Interior, Justice and Peace, Diosdado Cabello; or governors, in which individuals suspected of having participated in the protests are disseminated in order to be located and detained by security forces.<sup>22</sup>

Consequently, the Commission understands, in light of the available information, that state agents themselves, even those in senior positions, are identified as those responsible for the events that the proposed beneficiary has been facing. This has an impact on the possible options she has to request protection at the domestic level, even more so in situations of state persecution under the current context.

- v. Lastly, it should be noted that one day before the presidential elections of July 28, 2024, SEBIN officials reportedly besieged Sairam Gabriela’s residence. They allegedly stayed for about an hour and took photographs, despite not showing any document justifying the operation. According to the representation, this act has been repeated on several occasions. The Commission acknowledges the aforementioned acts with concern in light of the accusations made in Mr.

<sup>21</sup> IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5.

<sup>22</sup> IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5, 59, 60, 128, 144, et al.

Cabello's program, and the possible follow-up actions that agents of the State are carrying out regarding the proposed beneficiary in the context of the country.

22. The Commission notes that the allegations presented by the representation are consistent with the context the IACHR has been observing through its monitoring and in the processing of other precautionary measures<sup>23</sup> in the post-electoral situation in Venezuela. This is particularly relevant in relation to the proposed beneficiary's human rights advocacy work and noticing that she is perceived by the ruling party as opposition to the government, as well as given her demand for an official response regarding the whereabouts and situation of her partner. In those matters, the Commission identified a consistent pattern of state actions following the detention of individuals perceived or identified as opposition members. These individuals are detained without knowledge of any criminal process against them and without having issued any judicial arrest warrants. Their places of detention are unknown, and they are often denied access to trusted legal representatives to protect their rights. Furthermore, there are serious restrictions on family members or lawyers, hindering their communication and access to minimal information about the detainees' legal situations.

23. 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 information 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 places the proposed beneficiary at risk. For its part, the alleged lack of response to the complaints filed in relation to the situation of Jesús Armas is highlighted. 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.

24. 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 serious risk to her rights to life and personal integrity.

25. With regard to the *urgency* requirement, the Commission considers that, given the events analyzed, framed in the context of persecution, it is possible to perceive the existence of a situation presenting an imminent risk; in particular insofar as the proposed beneficiary continues to carry out her work of defending human rights and demanding official information about her partner, who is the beneficiary of precautionary measures. The threats issued by senior state officials and the harassment at her place of residence highlight a risk that could materialize at any moment if immediate measures are not taken for her protection.

26. 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.

## **V. BENEFICIARY**

27. The Commission declares Sairam Gabriela Rivas Moreno as the beneficiary, who is duly identified in this proceeding.

## **VI. DECISION**

28. The Commission considers that this matter meets *prima facie* the requirements of seriousness, urgency, and irreparable harm contained in Article 25 of its Rules of Procedure, in relation to Sairam Gabriela

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<sup>23</sup> See, in general: IACHR, [Press Release 319/24](#), Venezuela: IACHR issues urgent alert regarding precautionary measures in the aftermath of the elections in Venezuela, December 17, 2024.



Rivas Moreno, in the terms indicated throughout this resolution. Therefore, it decides to extend the precautionary measures in her favor, considering that they have a common situation presenting a risk that is the subject of these precautionary measures. Therefore, the Commission requests that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Sairam Gabriela Rivas Moreno;
- b) implement the corresponding measures to guarantee that the beneficiary can continue to carry out her human rights defense activities without being subject 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;
- c) report on the existing criminal investigations involving her; present any judicial arrest warrants, if applicable; and provide adequate security guarantees during the course of any investigations;
- d) consult and agree upon the measures to be adopted with the beneficiary and her representation; and
- e) report on the actions taken to investigate the alleged facts that led to this extension of the precautionary measure, so as to prevent such events from reoccurring.

29) 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 providing updated information on the threatening situation, as well as any additional information they deem pertinent.

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

31) Approved on April 24, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Edgar Stuardo Ralón Orellana; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Jorge Meza Flores  
Assistant Executive Secretary