
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUCIÓN 69/2025**

Precautionary Measure No. 1101-25
Irvin Jeovanny Quintanilla García regarding El Salvador
October 2, 2025
Original: Spanish

I. INTRODUCTION

1. On August 6, 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 Dennis Estanley Muñoz Rosa (“the applicant” or “the requesting party”) urging the Commission to require that the Republic of El Salvador (“the State” or “El Salvador”) adopt the necessary measures to protect the rights to life and personal integrity of Irvin Jeovanny Quintanilla García (“the proposed beneficiary”). According to the request, the proposed beneficiary was deported from the United States to El Salvador on March 15, 2025 and, as of that date, his whereabouts or situation have been unknown.

2. Pursuant to Article 25 of its Rules of Procedure, the IACHR requested information from the State on August 21, 2025, and granted an extension on August 27, 2025. On August 30, 2025, the State submitted its response. For its part, the applicant submitted additional information on August 17, 2025. On September 23, 2025, the IACHR requested clarification on confidential information that had been released, and the State responded on September 24, 2025.

3. Upon analyzing the submissions of fact and law furnished by the parties, the Commission considers that the proposed beneficiary is in a serious and urgent situation, given that his current location in El Salvador is unknown to date. Consequently, based on Article 25 of its Rules of Procedure, it requests that El Salvador: a) adopt the immediate measures necessary to determine the situation of the beneficiary, and inform this Commission, legal representatives, and family members of his whereabouts, in order to protect his rights to life and personal integrity; b) consult and agree upon the measures to be implemented with his representatives; and c) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

II. SUMMARY OF FACTS AND ARGUMENTS PROVIDED BY THE PARTIES

A. Information provided by the requesting party

4. The proposed beneficiary¹ is 24 years old and a Salvadoran national. He reportedly lived in the city of Irving, State of Texas, United States, for about ten years. The request includes a document entitled “Family Status Record” from the Municipal Mayor’s Office of San Miguel, El Salvador, dated 2001, which states that the name of the proposed beneficiary is Irvin Jeovanny; his father’s surname is Quintanilla; and his mother’s surname is García.

5. On December 13, 2024, a patrol car reportedly detained the proposed beneficiary in a parking lot in Irving, Texas, United States, without explanation and took him to jail. He was allegedly cleared of charges, but he had a deportation order from the U.S. Immigration Service dated October 2024 for failing to appear before an immigration judge in an asylum case that he indicated he was “pursuing.” The status of this process was not reported. On March 5, 2025, he was reportedly transferred to an “Immigration Prison,” where he remained for ten days, during which he was able to communicate with his family. The last call with his mother

¹ In a section of the request, the proposed beneficiary is identified as Irvin Jeovanny García Quintanilla.

was reportedly on March 9 or 10, 2025.² Subsequently, his family waited for another call from the proposed beneficiary as he had stated that he required his birth certificate so that the Immigration Service could deport him to El Salvador. After not receiving his call, on March 17, 2025, his brother spoke with the U.S. Immigration offices, who told him that the proposed beneficiary had been deported, to his country of origin on March 15, 2025, on flights carrying Venezuelan nationals. The applicant emphasized that it is public knowledge that these individuals were detained at the Terrorism Confinement Center (*Centro de Confinamiento de Terrorismo*, CECOT) in El Salvador. Since that moment, his family has not had any information on his whereabouts.

6. According to the applicant, based on a report dated July 17, 2025,³ the flight that reportedly deported the Venezuelan citizens also carried one Uruguayan and at least 18 Salvadorans, whose whereabouts are unknown. The applicant continued to report that the article also included a list with the name “Irvin Quintanilla-García,” stating that he had been in El Salvador since March 2025, as there was no official source from the Salvadoran authorities. The applicant described the situation as an “enforced disappearance.” He also alleged that, in the United States, the proposed beneficiary’s brother contacted the consulate of El Salvador in Texas to request assistance in locating the proposed beneficiary. According to the request, “they told him at that location that he had been deported to El Salvador on March 15, 2025, on flights carrying Venezuelan nationals who were deported to El Salvador, specifically to CECOT.”

7. The applicant referred to the following procedures carried out by a family member and by the representation:

- April 9, 2025: Action before the Migrant Assistance Office (*Gerencia de Atención al Migrante*) “La Chacra”, of the General Directorate of Migration and Foreign Affairs. According to a document attached to the file, the authorities verbally informed them that the proposed beneficiary had not entered the country and was not listed in the records of deported or returned migrants.⁴ This is despite the fact that relatives in the United States had been assured that he had already been deported to El Salvador.⁵
- April 9, 2025: Notice of the proposed beneficiary’s disappearance and request for his location and whereabouts before the Office of the Attorney General of the Republic (FGR) of the District of San Miguel. According to the attached document, the U.S. immigration authorities told the proposed beneficiary’s brother that the proposed beneficiary was deported on March 15, 2025, due to a deportation order issued by the competent immigration judge in October 2024. He also reported that he had inquired at the La Chacra Migrant Assistance Office, but had not received a response. Consequently, a missing person report was filed for the proposed beneficiary, and the authorities were requested to search for him and provide a written response.⁶
- April 9, 2025: Request for location and whereabouts of the proposed beneficiary to the Directorate General of Migration and Foreign Affairs. No response has been sent. According to the attached document, the letter requested that a search be conducted in the records and databases of the institution, as well as other entities, to determine whether he entered the country or any penal facility by air, sea, or land, and that a written response be provided.⁷

² In the initial request from August 6, 2025, they report that it occurred on March 10, 2025. In the following communication received on August 17, 2025, they stated that it was March 9, 2025.

³ According to the aforementioned report, corresponding to the media outlet “404media”, the data obtained from flight manifests allegedly reveal dozens of people on three deportation flights to El Salvador, who are allegedly not included in the list published by the Department of Homeland Security (DHS) of people deported from the United States on these flights. These individuals were reportedly detained and there is no information on their whereabouts or circumstances. There are reportedly no records or court files for almost all of these people. For example, it notes that one person on the manifesto appears to have been arrested by Texas police in late December for drug possession and is listed in arrest records as an “illegal immigrant.” Information available at: <https://www.404media.co/flight-manifests-reveal-dozens-of-previously-unknown-people-on-three-deportation-flights-to-el-salvador/>

⁴ Letter dated April 9, 2025 addressed to the Directorate General of Immigration and Foreign Affairs, attached to the request.

⁵ Letter dated April 9, 2025 addressed to the Directorate General of Immigration and Foreign Affairs by the proposed beneficiary’s aunt, attached to the request.

⁶ Letter dated April 9, 2025 addressed to the Office of the Attorney General, attached to the request.

⁷ Letter dated April 9, 2025 addressed to the Directorate General of Immigration and Foreign Affairs, attached to the request.

- According to the attached documentation, in an official letter dated April 24, 2025, from the Office of the Attorney General, the proposed beneficiary's aunt submitted a request on that same date stating that she reported the disappearance of her nephew, who was allegedly deported in mid-March; that she requested information from the General Directorate of Migration and Foreign Affairs on the return of her relative on April 9, 2025, but has not received a response; and requested that her nephew's immigration movements be investigated as possible and that a search be conducted in the various prisons.⁸ In this official letter, the Office of the Attorney General responded the following:

"It was already requested through the liaison system between the Office of the Attorney General and the General Directorate of Penitentiaries, a report in which it is determined if Irvin Jeovanny Quintanilla García has entered any penitentiary in the country and is allegedly waiting for the certifications, which has an approximate prudential time in its referral, which may range from ten to twelve business days". Regarding their migratory movements, he indicated that "they have already been requested through the fiscal liaison system to the General Directorate of Migration and Foreign Affairs, which is also expected to be forwarded within the same approximate time frame mentioned above."⁹

- May 13, 2025: Complaint to the Office of the Attorney for the Defense of Human Rights in order to determine the proposed beneficiary's location. A search is requested for the proposed beneficiary due to failure to report his whereabouts.¹⁰ It also warns that there is no response to this date.
- May 14, 2025: As a result of the authorities' inactions, a writ of *habeas corpus* was filed (HC-329-2025) to search for the proposed beneficiary due to his illegal detention or his disappearance. It was also alleged that complaints had been filed against the General Directorate of Migration and Foreign Affairs and the Office of the Attorney General Office, as these were the institutions to which the letters had been sent and to date no response had been received. The applicant indicated that it reportedly did not receive a response regarding the proposed beneficiary's location in the event that he had entered the country by any means or if he is being held in a penitentiary. According to the applicant to date, the Constitutional Chamber has not responded, and they therefore do not know his whereabouts or whether he is alive, what his health conditions are if he is alive and where he is located, or whether there are criminal proceedings against him. Nor has its admissibility been notified.

8. In general terms, the applicant reported that the Office of the Attorney General emphasized that they could not locate the proposed beneficiary and that he is reportedly not at the disposal of any institution. They also stated that he is not in El Salvador, as he has not entered the country according to records from the General Directorate of Migration and Foreign Affairs.

9. Lastly, the applicant believes that the situation that the proposed beneficiary faces is concerning, as there has been no information about his whereabouts, his health, whether he was facing criminal proceedings, or even whether he was still alive. It was considered that he could be under "unlawful detention". It stated that the State should locate or know the official whereabouts of the proposed beneficiary, his legal situation and what institution he is allegedly being held in.

B. Response from the State

10. The State considered that this request does not meet the criteria set out in Article 25 of the Commission's Rules of Procedure. It argued that it lacks solid reasoning, as it does not provide even minimal evidence of the seriousness, urgency, and risk of irreparable harm. It stressed that the diligence shown by the State shows its commitment to the protection of its citizens, even in situations beyond its direct jurisdiction.

11. The State pointed out that no concrete facts were presented to show an imminent risk or real danger to the rights of the proposed beneficiary. It questioned the fact that the request is based on an allegation

⁸ Official letter reference 00331-UDCV-2025-SM Unit of crimes related to life and physical integrity, San Miguel Prosecutor's Office, Office of the Attorney General of El Salvador, attached to the request.

⁹ Official letter reference 00331-UDCV-2025-SM Unit of crimes related to life and physical integrity, San Miguel Prosecutor's Office, Office of the Attorney General of El Salvador, attached to the request

¹⁰ Letter dated May 14, 2025 addressed to the Office of the Attorney for the Defense of Human Rights, attached to the request.

of enforced disappearance, for which the State of El Salvador is being held responsible. However, according to the criteria of the United Nations Working Group on Enforced or Involuntary Disappearances, the disappearance must be directly linked to the deprivation of liberty by state agents, given that the detention allegedly occurred under the jurisdiction of another state. Consequently, the State is unable to provide information or observations on the actions of a foreign State or to document the resources available in its territory.

12. The State also argued that, although it was indicated that his relatives were told that he had been transferred to El Salvador, no supporting documentation was attached. As this was a request concerning a Salvadoran national, the State attempted to clarify the material situation of the proposed beneficiary within the framework of its jurisdiction, for which purpose a series of actions were taken.

13. Regarding the proposed beneficiary's whereabouts, the State deployed immediate and coordinated efforts to determine his location. The records were verified in the General Directorate of Migration, Office of the Attorney General of El Salvador, the General Directorate of Penitentiaries and the National Civil Police, but there are no records of him in Salvadoran territory. These actions were allegedly hindered by discrepancies in the identification of the proposed beneficiary, as he pointed out that the information provided in this case identifies the proposed beneficiary as "Irvin Jeovanny García Quintanilla" and as "Irvin Jeovanny Quintanilla García," which makes it difficult to search official records. Despite the above, the Office of the Attorney General opened an investigation into the disappearance of a person under the name "Irvin Jeovanny Quintanilla García." Based on the "Protocol for Urgent Action and Strategy for Searching for Missing Persons in El Salvador," in this investigation, the Office of the Attorney General instructed the National Civil Police to conduct exhaustive proceedings, including interviews with family members, inquiries on social media, and consultations with INTERPOL, the General Directorate of Migration and Foreign Affairs, and the General Directorate of Penitentiaries. The State considered that these efforts show its due diligence, that it complies with its obligation to investigate, and that it deploys all legal, institutional, and operational mechanisms at its disposal to determine the whereabouts of the proposed beneficiary, despite not being responsible for the alleged disappearance. According to the State, inter-American jurisprudence establishes the obligation to investigate possible human rights violations, but does not create automatic liability for acts that are not attributable to it.

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

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

15. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.¹¹ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.¹² To do this, the IACHR shall assess the

¹¹ 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.

¹² 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.

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.¹³ 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.¹⁴ 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.

16. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt. The information provided should be assessed from a *prima facie standard of review to determine whether a serious and urgent situation exists*.¹⁵ Similarly, the Commission recalls that, by its own mandate, it is not in its purview to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.¹⁶ 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 its Rules of Procedure, which can be carried out without making any determination on the merits.¹⁷

17. Prior to analyzing the procedural requirements, the Commission considers it relevant to make two clarifications regarding the following points: i. the identity of the proposed beneficiary and the argument on discrepancies presented by the State in this regard, and ii. the State regarding which this request for precautionary measures was filed and processed. The IACHR’s assessment of these aspects follows:

¹³ 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).

¹⁴ I/A Court H.R., Matter of the 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.

I/A ¹⁵ 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.

¹⁶ IACHR, Resolution No. 2/2015, Precautionary Measures No. 455-13, Matter of Nestora Salgado regarding Mexico, January 28, 2015, para. 14; Resolution No. 37/2021, Precautionary Measures No. 96/21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

¹⁷ 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.” See in this regard: I/A Court H.R., Matter of James et al. regarding Trinidad and Tobago, Provisional Measures, Order of August 29, 1998, considerandum 6; Matter of Familia Barrios Vs. Venezuela, Provisional Measures, Order of April 22, 2021, considerandum 2.

- i. On the first point, the Commission understands that, according to the available documentation issued by the state family registry authority, the first and last names of the proposed beneficiary are detailed and known to the State. In this regard, although the applicant identified the name of the proposed beneficiary differently in part of its brief, the accompanying documentary evidence issued by the Municipal Mayor's Office of San Miguel, El Salvador, in 2001, details the full name of the proposed beneficiary and the surnames of his father and mother. In addition, the IACHR acknowledges that the State itself reported on an investigation into the disappearance of a person under the same name that appears in the documentation of the Municipal Mayor's Office of San Miguel, El Salvador.
- ii. On the second point, the Commission recalls that this request was processed regarding El Salvador. The request claimed that the whereabouts of the proposed beneficiary are unknown following his deportation to the country in March 2025. In this regard, under the mechanism of precautionary measures, the Commission analyzes whether there is a situation of seriousness, urgency, and irreparable harm to the rights of the proposed beneficiary in El Salvador. The precautionary measures mechanism is not called upon to determine the international responsibility of the States, which is better suited to the Petition and Case System, given the procedural prerequisites for it.

18. Having specified the above, the Commission continues with the analysis of the procedural requirements.

19. Regarding the seriousness requirement, the Commission considers that it has been met. The proposed beneficiary's whereabouts have been unknown since March 15, 2025, the date on which he was reportedly deported from the United States to El Salvador, along with people of Venezuelan and other nationalities. In this regard, the Commission understands that, according to the applicant's allegation, there are indications that this deportation took place: (i) the proposed beneficiary reportedly informed the family that he was in a "Migration Prison" with a view to being deported to El Salvador, with a prior deportation order, and the externalized need to have his birth certificate for this purpose; (ii) the U.S. Immigration offices had informed the proposed beneficiary's brother that the deportation had already taken place to the CECOT in El Salvador; and (iii) the consular authorities of El Salvador in Texas, United States, had also confirmed the deportation to the same place. In addition, the applicant's argument is consistent with the information that the Commission has received on the deportation of persons of Venezuelan nationality, along with other nationalities, to El Salvador, which has motivated the pronouncement of various international organizations, both of this Commission,¹⁸ such as the United Nations High Commissioner for Human Rights,¹⁹ and United Nations human rights experts,²⁰ as well as the media, such as that reported by the applicant.

20. Although the State questions the lack of documentary evidence provided by the applicant to support its claims, the Commission understands that this is precisely the difficulty faced by the relatives in determining the legal status of the proposed beneficiary, given the indications that he was deported to El Salvador. In this regard, the Commission recalls that, through Resolution 4/19 containing the Inter-American Principles on the Human Rights of All Migrants, Refugees, Stateless Persons and Victims of Human Trafficking, it has urged States of origin and destination to articulate resources to establish more efficient coordination mechanisms so that family members know the exact place and time when their family member will be deported, as well as the necessary means to establish communication with their relatives and inform them of the place and time of their arrival.²¹ Consequently, this Commission is concerned that no records have been identified of

¹⁸ IACHR, Press Release No. 162/2025, El Salvador: IACHR reiterates concern over the excessive prolongation and improper application of the state of emergency, August 14, 2025.

¹⁹ UN, Office of the High Commissioner for Human Rights, Central America and Caribbean Regional Office, News-Featured News: UN High Commissioner for Human Rights expresses human rights concerns about deportations from the United States, May 13, 2025.

²⁰ UN, Office of the High Commissioner for Human Rights, Press Release, Special Procedures: "UN Experts Alarmed by Illegal Deportations from the United States to El Salvador." April 30, 2025

²¹ IACHR, Resolution No. 04/19 Inter-American Principles on the Human Rights of All Migrants, Refugees, Stateless Persons and Victims of Human Trafficking, December 7, 2019, principle 75.

the proposed beneficiary's entry into the country, or that no details have been provided on coordination, for example, diplomatic coordination with the other country involved in the deportation process to El Salvador. Similarly, there is no information on the extent of consular assistance eventually provided to the proposed beneficiary, given the knowledge that the consular authorities of El Salvador in Texas, United States, allegedly had. The Salvadoran government has not provided information on the steps taken with the United States to confirm or challenge the information indicating that the proposed beneficiary was deported on March 15, 2025.

21. Given the absence of documentary evidence regarding the responses of state entities (the General Directorate of Migration, the Office of the Attorney General, the General Directorate of Penitentiaries, and the National Civil Police) that indicate that the proposed beneficiary is not in Salvadoran territory, the Commission does not have the information necessary to assess whether attempts were made to identify or rule out, for example, that he was on the manifest of flights carrying Venezuelan nationals who arrived in the country to be transferred to CECOT. This Commission observes that, according to the information submitted by the applicant, the institutions of El Salvador have been aware of this situation since at least April 2025, and have not provided a formal response to his family with the corresponding explanations, for which a writ of *habeas corpus* was filed on May 14, 2025 before the Constitutional Chamber of El Salvador. This last appeal would remain pending and no decision has been made on its admissibility. In its response, the State did not refer to this matter or present the status of the proceedings relating to this appeal, and this Commission has no grounds to dispute the applicant's allegations.

22. In line with the lack of information on the specific actions taken to locate the proposed beneficiary, the IACHR does not see any documentary evidence revealing that the State has searched for and ruled out the possibility that the proposed beneficiary is being held in the CECOT. The foregoing is relevant given the applicant's consistent argument is that the proposed beneficiary was deported to that prison in El Salvador. In this regard, it is recalled that Rule 6 of the United Nations Standard Minimum Rules for the Treatment of Prisoners establishes, among others, that "There shall be a standardized prisoner file management system in every place where persons are imprisoned."²²

23. The Commission acknowledges the State's response and its express commitment to the protection of its citizens. In particular, it takes note of the investigation into the disappearance being conducted by the Office of the Prosecutor, in the context of which, based on the "Protocol for Urgent Action and Strategy for the Search for Missing Persons in El Salvador," various steps have been taken. However, it is an undisputed fact that, as of today, the whereabouts of the proposed beneficiary are unknown in El Salvador.

24. The Commission understands that the passage of time may make it difficult to locate the proposed beneficiary. Consequently, recognizing that the State acknowledged the due diligence of its actions, the Commission considers that it is time to adopt the additional measures necessary to locate him or determine his whereabouts as soon as possible, redoubling efforts to do so. In view of the foregoing, although the Commission is not called upon to qualify the domestic investigations and processes in this procedure, it notes that actions aimed at determining the whereabouts or fate of a disappeared person are directly related to the need to prevent harm from occurring to their rights and that, until their situation has been clarified, the proposed beneficiary allegedly faces a serious risk.²³ The Commission recalls that in cases involving recent disappearances, it has found that, despite the investigative steps and search efforts undertaken by the State,

22

²³ I/A Court H.R., Order of the Inter-American Court of Human Rights of May 26, 2010, Provisional Measures regarding the United States of Mexico, Matter of Alvarado Reyes et al., para. 9. See also: IACHR, Resolution 43/2020, Precautionary Measure No. 691-20, Facundo José Astudillo Castro regarding Argentina, August 1, 2020, para. 25; Resolution 69/2023, Precautionary Measure No. 845-23, Silvestre Merlín Domínguez et al. regarding Mexico, November 20, 2023, para. 25

risk factors persist as long as the whereabouts of the disappeared person remain unknown and the facts of the case have not been clarified.²⁴

25. In summary, the Commission values the commitment of the state authorities to locate the proposed beneficiary. However, it warns that to date he is still missing; about six months have passed since his deportation to the country, which has not been challenged by the State. In these circumstances, based on the *prima facie* standard applicable to the precautionary measures mechanism, the Commission concludes that it is sufficiently established that there is a serious risk to the proposed beneficiary's rights to life and personal integrity, to the extent that his fate or whereabouts are unknown to date and that there is no information that points to the clarification of the facts that gave rise to this request.

26. Regarding the requirement of *urgency*, the Commission deems that it has been met, inasmuch as the passage of time without establishing his whereabouts is likely to generate greater impacts on the rights to life and personal integrity of the proposed beneficiary. In this regard, since more than five months have passed since his whereabouts have been unknown, the Commission considers it necessary to adopt immediate measures to safeguard his rights.

27. As it pertains to the requirement of *irreparable harm*, the Commission believes it is met, since the possible impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

IV. BENEFICIARY

28. The Commission declares as the beneficiary of the precautionary measure Mr. Irvin Jeovanny Quintanilla García, who is duly identified in these proceedings.

V. DECISION

29. The Inter-American Commission considers 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 El Salvador:

- a) adopt the immediate measures necessary to determine the situation of the beneficiary, and inform this Commission, legal representatives, and family members of his whereabouts, in order to protect his rights to life and personal integrity;
- b) consult and agree upon the measures to be implemented with his representatives;
- c) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

²⁴ IACHR, Resolution No. 48/2025, Precautionary Measures No. 19-25, Julia Chuñil Catricura regarding Chile, July 14, 2025; Resolution No. 12/2025, Precautionary Measures No. 1350-24, Matter of Edwin Edgardo Lainez Ordoñez regarding Honduras, February 2, 2025; Resolution No. 69/2023, Precautionary Measure 845-23, Matter of Silvestre Merlín Domínguez et al. regarding Mexico, November 20, 2023; Resolution No. 69/2023, Precautionary Measures No. 42-23, Ricardo Arturo Lagunes Gasca and Antonio Díaz Valencia regarding Mexico; Resolution No. 24/2022, Precautionary Measures No. 449-22, Case Bruno Araújo Pereira and Dom Phillips regarding Brazil, June 11, 2022; Resolution No. 86/2021, Precautionary Measures No. 869-21, Matter of Antônio Martins Alves regarding Brazil, October 21, 2021; Resolution 24/2018, Precautionary Measures No. 81-18, Matter of Náthaly Sara Salazar Ayala regarding Peru, April 8, 2018.

30. The Commission also requests that the State of El Salvador report, within 15 days as from the day after this resolution, on the adoption of the required precautionary measures and to update that information periodically.

31. The Commission emphasizes that, in accordance with Article 25(8) of its Rules of Procedure, the granting of this precautionary measure and its adoption by the State do not constitute a prejudgment on any violation of the rights protected under the applicable instruments.

32. The Commission instructs its Executive Secretariat to notify this resolution to El Salvador and the requesting party.

33. Approved on October 2, 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.

Tania Reneaum Panszi
Executive Secretary