

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 70/2025**

Precautionary Measure No. 1224-25
Camilo Castro regarding Venezuela
October 2, 2025
Original: Spanish

I. INTRODUCTION

1. On August 25, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received a request for precautionary measures filed by the NGO *Foro Penal* (“the applicants”) urging the Commission to request that the Bolivarian Republic of Venezuela (the “State” or “Venezuela”) adopt the necessary measures to protect the rights of Camilo Castro (“the proposed beneficiary”). According to the request, the proposed beneficiary, a French citizen and yoga teacher, traveled to the Venezuelan border to complete immigration procedures on June 26, 2025. Since then, his whereabouts have been unknown.

2. The Commission requested additional information from the applicants on September 2, 2025 and received a response on September 4, 2025. Pursuant to the provisions of Article 25(5) of its Rules of Procedure and the Inter-American Convention on Forced Disappearance of Persons, the Commission requested information from the State on September 9, 2025. To date, the State has not responded, and the granted deadline has expired.

3. Upon analyzing the submissions of fact and law furnished by the requesting party, the Commission recognizes that Camilo Castro is in a serious and urgent situation, given that his rights to life and personal integrity are at risk of irreparable harm. Therefore, pursuant to the provisions of Article 25 of its Rules of Procedure, the Commission requests that Venezuela: a) adopt the necessary measures to protect the rights to life and personal integrity of Camilo Castro. In particular: i. report whether the beneficiary is in the custody of the State and, if so, indicate the reason and circumstances of his detention; or, the measures taken to determine his whereabouts or fate; ii. if the beneficiary is in the custody of the State, clarify whether he has been charged with crimes and whether he has been brought before a competent court to review his detention, and if so, expressly mention the court that hears his criminal case, or if he has not appeared before a court, the reason why he has not done so; iii. facilitate the beneficiary’s communication with his family, representatives, trusted attorneys and consular authorities of the country he is a national, and give them full access to his judicial file, if any; iv. report whether the beneficiary has been provided access to a translator or interpreter in order to take accurate knowledge of his situation and exercise his rights; v. enable him to have communication with the country of which he is a national; and b) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

II. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. According to the request, Camilo Castro is a French citizen and yoga teacher. It was reported that he had been living in Santa Marta, Colombia, for about a year, where he was building a cabin and offering yoga classes. On June 26, 2025, he traveled to Maicao to have his passport stamped and complete immigration formalities, as his permit to stay in Colombia had expired. From there, he contacted his mother, also a French citizen, and told her that he was having difficulty getting his document stamped, so he informed her of his intention to go to the Paraguachón border crossing on the border with Venezuela. Since then, the proposed beneficiary has been missing.

5. The request indicated that, after several days of uncertainty and search, it was learned that he was being held by Venezuelan authorities due to alleged immigration irregularities. On July 26, 2025, the proposed beneficiary allegedly sent a voice note to relatives indicating that he was still detained. After that, there was no further contact with him.

6. According to unofficial information, the proposed beneficiary may be detained in the “El Rodeo I” Prison, in the state of Miranda, Venezuela. This information was allegedly obtained through conversations between the applicant and other foreigners who were allegedly arbitrarily detained in Venezuela and subsequently released from prison. The request reported the systematic practice of arbitrary detention of foreign nationals at El Rodeo I, including the incommunicado detention of detainees and the denial of access to their trusted counsel and consular assistance.

7. The applicants stated that it has not been possible to activate legal proceedings on behalf of the proposed beneficiary, given that his relatives are not in Venezuela and the Venezuelan authorities require the physical presence of a relative or close friend in order to submit any request on his behalf. The request stated that, because the proposed beneficiary and their relatives are foreigners and therefore face significant risk, the family members cannot safely travel to the country in person. In this regard, they added that he has been unable to exercise his legal defense, as his place of detention is not officially known, nor are the details of the criminal case in which he is allegedly involved. However, through his relatives and the NGO *Foro Penal*, the situation was reported to the Foreign Ministry and the French Embassy in Venezuela, institutions with which several meetings were held. Despite the foregoing, the request stated that the proposed beneficiary had not been allowed access to consular assistance.

8. To date, family members and relatives have no official information on his whereabouts or fate. In addition, they do not know whether he had access to a translator, the charges against him, or his detention conditions. The applicants clarified that the proposed beneficiary has not been involved in any criminal activity, and therefore considers his detention to be arbitrary.

B. Response from the State

9. The Commission requested information from the State on September 9, 2025. To date, no response has been received from the State, and the granted timeline has expired.

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

10. 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.

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.¹ Regarding the protective nature, these measures seek

¹ Inter-American Court of Human Rights (I/A Court H.R.), [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#), Provisional Measures regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; [Case of Carpio Nicolle et al. v. Guatemala](#), Provisional Measures, Order of July 6, 2009, considerandum 16.

to avoid irreparable harm and to protect the exercise of human rights.² 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.³ As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits, and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect (*effet utile*) of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.⁴ In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

- a. “serious situation” refers to a grave impact that an action or omission can have on a protected right or on the eventual effect of a pending decision in a case or petition before the organs of the inter-American system;
- b. “urgent situation” refers to risk or threat that is imminent and can materialize, thus requiring immediate preventive or protective action; and
- c. “irreparable harm” refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

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.⁵ Similarly, the Commission recalls that, by its own mandate, it is not within its purview to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.⁶ This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be carried out without making any determination on the merits.⁷

² I/A Court H.R., Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; Case of Bámaca Velásquez, Provisional measures regarding Guatemala, Order of January 27, 2009, considerandum 45; Matter of Fernández Ortega et al., Provisional measures regarding Mexico, Order of April 30, 2009, considerandum 5; Matter of Milagro Sala, Provisional measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish).

³ I/A Court H.R., Matter of Milagro Sala, Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; Matter of the Criminal Institute of Plácido de Sá Carvalho, Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

⁴ I/A Court H.R., Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 7; Matter of “El Nacional” and “Así es la Noticia” newspapers, Provisional Measures regarding Venezuela, Order of November 25, 2008, considerandum 23; Matter of Luis Uzcátegui, Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19 (Available only in Spanish).

⁵ I/A Court H.R., Matter of Members of the Miskitu Indigenous Peoples of the North Caribbean Coast regarding Nicaragua, Extension of Provisional Measures, Order of August 23, 2018, considerandum 13 (Available only in Spanish); Matter of children and adolescents deprived of liberty in the “Complexo do Tatuapé” of the Fundação CASA, Provisional Measures regarding Brazil, Order of July 4, 2006, considerandum 23.

⁶ IACHR, Resolution 2/2015, Precautionary Measure No. 455-13, Matter of Nestora Salgado regarding Mexico, January 28, 2015, para. 14; Resolution 37/2021, Precautionary Measure No. 96-21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

⁷ In this regard, the Court has stated that “[it] cannot, in a provisional measure, consider the merits of any arguments pertaining to issues other than those which relate strictly to the extreme gravity and urgency and the necessity to avoid irreparable damage to persons.” I/A Court H.R., Matter of James et al. regarding Trinidad and Tobago, Provisional Measures, Order of August 29, 1998, considerandum 6 (Available only in Spanish); Case of the Barrios Family v. Venezuela, Provisional Measures, Order of April 22, 2021, considerandum 2 (Available only in Spanish).

13. By the same token, in understanding the facts alleged by the applicants, the Commission observes that the Inter-American Convention on Forced Disappearance of Persons, to which the State of Venezuela has been annexed since its ratification on July 6, 1998⁸ considers forced disappearance as the act “[...] perpetrated by agents of the state or by persons or groups of persons acting with the authorization, support, or acquiescence of the state, followed by an absence of information or a refusal to acknowledge that deprivation of freedom or to give information on the whereabouts of that person, thereby impeding his or her recourse to the applicable legal remedies and procedural guarantees.”⁹ In addition, the Inter-American Commission highlights what was established by the United Nations Working Group on Enforced or Involuntary Disappearances, in the sense that “there is no minimum time, however short, to consider that an enforced disappearance has occurred.”¹⁰

14. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,¹¹ and has included the country in Chapter IV.B of its Annual Report. The Commission has also issued press releases and country reports, and established a special follow-up mechanism for the country, Special Follow-up Mechanism for Venezuela, known as MESEVE for its acronym in Spanish.

15. 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, while using “terror as a tool of social control.”¹²

16. In 2025, the IACHR condemned the situation of persons deprived of their liberty in Venezuela in the context of the country.¹³ The IACHR identified that relatives have not yet received a formal communication about the detention center where their loved ones are held.¹⁴ In other cases, they have only been able to find out that they are alive and where they are being held through information shared by other inmates, or because officials from the Bolivarian National Intelligence Service call them to ask them to bring medicine or collect dirty clothes for washing.¹⁵ During its 192nd session, the Commission was able to obtain information on the situation of persons deprived of their liberty in the post-election context and received testimonies from relatives of victims and civil society on arbitrary detentions, torture, and serious detention conditions.¹⁶

17. In addition to the above, within the framework of the precautionary measures mechanism, the Commission has identified that the State of Venezuela has previously detained foreign nationals in factual circumstances similar to those alleged in this matter under the current context in the country. For example, Sofía María Sahagún Ortiz, a Venezuelan and Spanish national,¹⁷ Yevhenii Petrovich Trush, a Ukrainian national,¹⁸ Lucas Jonas Hunter, a French and American national¹⁹ Alberto Trentini, an Italian national,²⁰ Nahuel

⁸ [Inter-American Convention on Forced Disappearance of Persons](#), Belém do Pará, Brazil, June 9, 1994, [Signatories and current status of ratifications of the Inter-American Convention on Forced Disappearance of Persons](#).

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

¹⁰ IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 85; United Nations Human Rights Council, Report of the Working Group on Enforced or Involuntary Disappearances, August 10, 2015, A/HRC/30/38, para. 102..

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

¹² IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5.

¹³ IACHR, [Press Release No. 72/25](#), Venezuela Must End the Incommunication of Political Prisoners and Release Them Immediately, April 11, 2025.

¹⁴ IACHR, Press Release No. 72/25, previously cited.

¹⁵ IACHR, Press Release No. 72/25, previously cited.

¹⁶ IACHR, [Press Release No. 50/25](#), IACHR ends the 192nd Period of Sessions with 32 hearings on human rights, March 7, 2025.

¹⁷ IACHR, [Resolution No. 59-25](#), Precautionary Measures No. 680-25, Sofía María Sahagún Ortiz regarding Venezuela, August 18, 2025; Resolution No.

¹⁸ IACHR, [Resolution No. 32/25](#), Precautionary Measures No. 334-25, Yevhenii Petrovich Trush regarding Venezuela, April 5, 2025.

¹⁹ IACHR, [Resolution No. 27/25](#), Precautionary Measures No. 247-25, Lucas Jonas Hunter regarding Venezuela, March 22, 2025.

²⁰ IACHR, [Resolution No. 2/25](#), Precautionary Measures No. 1438-24, Alberto Trentini regarding Venezuela, January 7, 2025.

Agustín Gallo, an Argentinean national,²¹ Arley Danilo Espitia Lara, a Colombian national,²² and Jan Darmovzal, a Czech national.²³

18. On March 18, 2025, at the 58th session of the United Nations Human Rights Council, the Chair of the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela stated that in February 2025, Nicolás Maduro announced that the authorities had detained more than 150 foreigners, describing them as “mercenaries,” whose arrests took place mainly in Venezuelan states bordering Colombia, primarily Colombian and U.S. nationalities.²⁴ They also mentioned that, in most of these cases, foreign detainees have not been granted access to communicate with a consular office or diplomatic mission of their home state. In addition, it was stated the authorities have ignored information requests from consulates and diplomatic missions and that, in some cases, families have also been unable to contact these detainees for several months.²⁵

19. Consequently, the Commission understands that the circumstances surrounding the proposed beneficiary’s detention, along with the IACHR monitoring of the country’s context, are relevant to the analysis of the procedural requirements.

20. With regard to the requirement of *seriousness*, the Commission considers that it has been met. Upon analyzing the proposed beneficiary’s situation, the Commission notes that, according to the information available, there has been no information on his whereabouts or destination after traveling to the border between Colombia and Venezuela to complete an immigration procedure on June 26, 2025. The Commission also highlights that it was later learned he may be detained by Venezuelan authorities for alleged immigration irregularities. An audio recording received on July 26, 2025, indicated that the proposed beneficiary reported he was still being deprived of his liberty. Although, through conversations with former prisoners, the applicants allegedly were informed that the proposed beneficiary was being held at El Rodeo I prison in Venezuela, this had not been officially confirmed by any authority.

21. In addition to the above, the Commission observes that the proposed beneficiary’s family members are unable to initiate legal proceedings in Venezuela. It was explained that the authorities require relatives to appear in person to submit requests, which is unfeasible given their status as foreigners and the alleged risk of traveling to the country in the current context, as documented in the March 2025 Report of the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela.

22. The Commission also notes that the right to legal defense has not been exercised, since the place of detention is unknown and there is no information about the criminal proceedings in which he is allegedly involved. Furthermore, despite the fact that the situation was reported to the Foreign Ministry and the French Embassy in Venezuela, the applicants indicated that the proposed beneficiary has not had access to consular assistance, which aggravates his situation of defenselessness.

23. In this regard, the Commission finds that family members and friends do not have access to any information about the proposed beneficiary, such as: official location, charges against him, case file number, competent court, existence of a court order that led to his deprivation of liberty, detention conditions, or whether he has undergone a medical evaluation. While this situation persists, the Commission considers that the proposed beneficiary is completely unprotected against the risks he may have faced after his whereabouts became unknown.

²¹ IACHR, [Resolution No. 1/25](#), Precautionary Measures No. 1432-24, Nahuel Agustín Gallo regarding Venezuela, January 1, 2025.

²² IACHR, [Resolution No. 99/24](#), Precautionary Measures No. 1331-24, Arley Danilo Espitia Lara regarding Venezuela, December 16, 2024.

²³ IACHR, [Resolution No. 80/24](#), Precautionary Measures No. 1150-24, Jan Darmovzal regarding Venezuela, October 31, 2024.

²⁴ United Nations, [Statement by Marta Valiñas, Chair of the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela, at the 58st session of the Human Rights Council](#), March 18, 2025, original in English.

²⁵ United Nations, [Statement by Marta Valiñas, Chair of the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela, at the 58st session of the Human Rights Council](#), already cited.

24. Given the proposed beneficiary's current situation, the Commission recalls that, according to inter-American standards, the State is obligated to maintain an updated record of detentions, promptly provide information about the person's whereabouts and health, and, if the person is in State custody, present them before a competent judicial authority within legal timeframes while fully respecting judicial guarantees at all times.²⁶ The IACHR also highlights that every detained person has the right to maintain direct and personal contact through regular visits with members of their family, legal representatives, and other persons.²⁷

25. Upon requesting information from the State, the Commission regrets its lack of response. Although the foregoing is not enough per se to justify the granting of a precautionary measure, it prevents the Commission from being aware of the observations or measures taken by the State to address the alleged risk that the proposed beneficiary faces. Therefore, the Commission does not have elements that would allow it to dispute the facts alleged by the applicants, nor to assess whether the risk that the proposed beneficiary faces has been addressed or mitigated.

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

27. Regarding the requirement of *urgency*, the Commission finds that it has been fulfilled, insofar as the proposed beneficiary's whereabouts remain unknown, and because, with the passage of time, the likelihood of violations of his rights increases. In addition, the proposed beneficiary's family and friends have not been able to activate internal mechanisms to locate him; and the Commission observed that he has not had access to consular assistance. There is also no information from the State on specific actions to address or mitigate the situation that places him at risk. Therefore, it is urgent to adopt measures to protect his life and personal integrity.

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

IV. BENEFICIARY

29. The Commission declares Camilo Castro as the beneficiary of the precautionary measures, who is duly identified in this proceeding.

V. DECISION

30. The Commission understands that this matter meets *prima facie* the requirements of seriousness, urgency, and irreparable harm set forth in Article 25 of its Rules of Procedure. Consequently, it requests that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Camilo Castro. In particular:

²⁶ IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), previously cited, para. 86.

²⁷ IACHR, [Principles and Good Practices on the Protection of Persons Deprived of Liberty in the Americas](#), adopted by the Commission during the 131st regular session, held from March 3 to 14, 2008, Principle XVIII.

- i. report whether the beneficiary is in the custody of the State and, if so, indicate the reason and circumstances of his detention; or, the measures taken to determine his whereabouts or fate;
 - ii. if the beneficiary is in the custody of the State, clarify whether he has been charged with crimes and whether he has been brought before a competent court to review his detention, and if so, expressly mention the court that hears his criminal case, or if he has not appeared before a court, the reason why he has not done so;
 - iii. facilitate the beneficiary's communication with his family, representatives, trusted attorneys and consular authorities of the country he is a national, and give them full access to his judicial file, if any;
 - iv. report whether the beneficiary has been provided access to a translator or interpreter in order to take accurate knowledge of his situation and exercise his rights;
 - v. enable him to have communication with the country of which he is a national; and
- b) 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.

31. The Commission requests that Venezuela report, within 15 days from the date of notification of this resolution, on the adoption of the requested precautionary measures and update that information periodically.

32. The Commission emphasizes that, pursuant to Article 25(8) of its Rules of Procedure, the granting of precautionary measures and their adoption by the State do not constitute a prejudgment regarding the possible violation of the rights protected in the American Convention and other applicable instruments.

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

34. 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