
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 73/2025**

Precautionary Measure No. 516-25
Juan Pablo Galvis Arango regarding Colombia¹
October 10, 2025
Original: Spanish

I. INTRODUCTION

1. On April 26, 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 Juan Pablo Galvis Arango (“the requesting party” or “the proposed beneficiary”) urging the Commission to require that the State of Colombia (“the State” or “Colombia”) adopt the necessary measures to protect his rights to life and personal integrity, as well as those of his family unit.² According to the request, the proposed beneficiary faces risk due to his work as a human rights defender, activist for the lesbian, gay, bisexual, transgender, and intersex (LGBTI) community, and for his complaints regarding the disappearance of his father. To date, the State has failed to provide effective and sufficient protection measures.

2. The Commission requested additional information from the applicants on July 22, 2025 and received a response on July 26, 27, 28, and 29, 2025. Pursuant to Article 25.5 of the Rules of Procedure, the IACHR requested information from the State on August 6, 2025, and reiterated its request for information on September 3, 2025. The State provided its report on September 3, 2025. The applicants provided their additional report on August 6, 7, and 19, as well as on September 2, 3, 4, 5, 6, and 12, 2025. The State submitted a new report on September 19, 2025. The applicants provided additional communication on September 27, 2025.

3. Upon analyzing the submissions of fact and law furnished by the parties, the Commission finds that the information presented shows *prima facie* that the proposed beneficiary is in a serious and urgent situation, given that his rights to life and personal integrity are at risk of irreparable harm. Consequently, the Commission requests that Colombia: a) adopt the necessary measures to protect the rights to life and integrity of Juan Pablo Galvis Arango; b) implement the necessary measures so that the beneficiary can carry out his activities as a human rights defender without being subjected to threats, harassment, or other acts of violence in the exercise of his work; c) consult and agree upon the measures to be adopted with the beneficiary and his representatives; and d) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

III. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. Juan Pablo Galvis Arango describes himself as a human rights defender and LGBTI activist in Barrancabermeja, Santander. He stated that he denounced the “enforced disappearance” of his father on September 6, 1985, in Magdalena Medio, allegedly at the hands of the Revolutionary Armed Forces of Colombia (FARC), as well as the forced displacement of his mother in October of that same year.

¹ In accordance with Article 17.2 of the Rules of Procedure of the IACHR, the Commissioner Carlos Bernal Pulido, of Colombian nationality, did not participate in the debate and deliberation of this matter.

² His mother and siblings were identified. It was specified that there are complaints about the “enforced disappearance” of his father since 1985.

5. In recent years, between 2014 and 2015, his family was once again the victim of forced displacement. At the time, they were reportedly granted protective measures due to threats received from non-state armed groups,³ but these measures were not enforced. As a result, the family was forced to move cities multiple times during 2016 and 2017. After moving to Bogotá, the Bogotá Prosecutor's Office provided him with tickets to move to Bucaramanga. He then reportedly moved to Barrancabermeja.

6. In relation to the investigation into his father's disappearance, the request stated that, in August 2024, the Justice and Peace Prosecutor's Office verbally informed the proposed beneficiary about the loss of physical documents from the corresponding file. In 2025, the case was assigned to Prosecutor's Office 148 in Cúcuta, where the prosecutor in charge suggested declaring his father "dead" in order to close the case. According to the attached documents, the proposed beneficiary sent several letters questioning the actions of the prosecutor's office and expressing his opposition to the closure of the case. Currently, the proposed beneficiary stated that his work focuses on giving talks to the LGBTI community and training young people to keep them away from non-state armed groups and criminal activities. In this context, in early 2025, he allegedly helped three young people leave Barrancabermeja, who were allegedly at risk of being killed by alias "Ito" because they were considered police informants.

7. According to available information, as a result of complaints made regarding the disappearance of his father, activism in favor of the LGBTI community, and the assistance provided to three young people to leave Barrancabermeja, the proposed beneficiary is reportedly being subjected to threats and surveillance, namely:

- a. On April 10, 2025, he received a call from an unknown individual, who demanded that he desist from searching for his father. This person reportedly warned the following: "Leave the dead in peace," "Don't go looking for more trouble," and "Stop drawing attention to yourself and sending more files, because that was already on file and there was no reason for you to be looking into it." In addition, they reportedly warned the proposed beneficiary that, if he did not obey, they were willing to "shut him up forever". It was indicated that the individual allegedly knew where he lived, with whom, where he went out, and how he got around. The individual also called him a "faggot".
- b. On April 11, 2025, the proposed beneficiary received another call from an unknown individual who told him: "This is not a warning, stay safe, you bastard, we already warned you and we're not here to play around."
- c. On April 14, 2025, the proposed beneficiary was approached by men identified as "peace signatories," who informed him that his father's disappearance had been perpetrated by "the guerrillas." The individuals advised him, "Don't kill yourself out trying to figure it out." That same day, he was working as a waiter when a man on a blue motorcycle shouted at him: "You bastard, I already told you, we don't want to see you around here." In addition, he reportedly pointed out: "be careful what you were saying in the JEP [Special Jurisdiction for Peace]," "that can be easily fixed," that "I know your family, your mother and siblings," and that "you don't want to be looking for a plot in the cemetery."
- d. Between April 24 and 25, 2025, he received a call from a concealed number. The caller warned him that "now he was really in trouble, they were going to pick him up for being a snitch, they were going to send a little gift to his house because he was talking too much, that he shouldn't try to shut him up once and for all, that they were going to throw a grenade at his house, that they knew where he lived with his mother, they knew where his siblings were and what time they got home." As a result, he left the city for his own safety.
- e. On May 10, 2025, when he returned to the city, he noticed a man on a motorcycle following him. The proposed beneficiary entered a store, and when he left the establishment, the subject continued to follow him. On May 11, 2025, he learned that this man, known by the alias "Momo", had been murdered near a supermarket in the Versalles neighborhood. The police found a gun in his pants. The proposed beneficiary stated that he usually goes to that supermarket on Sundays, but on that day he was unable to go due to his commitments. He believes that he was the target.

³ Documents were attached with the self-protection measures recommended by the National Police of the Magdalena Medio Department dated June 7, 2014, and October 3, 2016.

- f. On the night of May 23, 2025, the proposed beneficiary was cycling to the El Llanito district. He was reportedly followed by motorized men, who fired two shots at him. However, he managed to run through the bushes and was helped by two vans that took him near his place of residence. They requested help from the police quadrant, but the police never arrived. The proposed beneficiary expressed fear of leaving his residence. He indicated that people were afraid to hire him. It was highlighted that he has had to change his residence on several occasions.
- g. On June 5, 2025, the proposed beneficiary was shopping at a store in Barrancabermeja when armed individuals entered the premises and started shooting. To protect himself, he hid among the vegetables inside the store. Once the attack was over, he went to a police officer standing at the corner near the traffic lights and told him what had happened and explained his situation. The officer allegedly simply suggested that he return to his residence and take shelter there, but did not accompany him.
- h. On June 8, 2025, around noon, as the proposed beneficiary was returning to his temporary home, shots were fired and a taxi-type vehicle was set on fire a short distance from his residence. The community members told the proposed beneficiary that there had never been an act of violence of this nature in the area. The applicants stated that he received calls warning him that they would send him “a little gift to calm him down forever and stop him from meddling in things that are none of his business.”
- i. On the afternoon of June 23, 2025, as the proposed beneficiary was leaving church and heading to his residence, he was intercepted by two individuals wearing full-face helmets and masks, riding a motorcycle with concealed license plates. According to the report, they told him that he was “not listening to them,” that they were giving him 24 to 72 hours to leave the city, that he would “pay a high price” and accused him of “going under the pretext of visiting people, but in reality it was to record, take photos, and report.” They reiterated that he “had no right to inform anyone.” They also warned him that “the previous attacks had been just a scare and that he would have to face the consequences if he did not leave Barrancabermeja,” and “that they were going to kill him and no one would ever find him.” Then they pushed him and hit him on the back with a weapon, saying that they knew he had filed a complaint with the Prosecutor’s Office, but that “he could shove those complaints up his ass.” It was alleged that they knew the license plate numbers of the two trucks that assisted the proposed beneficiary in the attack on May 23, 2025. The applicants stated that the alleged aggressors are reportedly able to access his complaints.
- j. On August 4, 2025, the proposed beneficiary was traveling to the Terrazas del Puerto neighborhood to hold a meeting with a group of women from the LGBTI community. Once there, individuals arrived and threatened him: “We’ll flip a coin. If it lands on heads, you’ll get a bullet; if it lands on tails, you’ll disappear.” They then blindfolded him, tied him up, and took him to an apartment. The applicants described the situation as a “kidnapping.” At the scene, the proposed beneficiary was beaten, threatened with death, and interrogated. The subjects allegedly accused him of being an infiltrator and mentioned that they administer justice by their own means in that area. The proposed beneficiary managed to hear that the criminal group was known as “Los Búcaros”. He was reportedly held for more than three hours, and was released during the night. He learned that the leaders of Terrazas del Puerto alert the criminal structure to “snitches” or informants, who are persecuted, killed, disappeared, or forcibly displaced. The LGBTI women warned the proposed beneficiary that he should leave the neighborhood because the police allegedly had ties to “Los Búcaros,” so he managed to escape through a wooded area.
- k. On August 9, 2025, he alleged that nearby residences were set on fire, reportedly in retaliation for complaints. He stated that violent homicides have reportedly been recorded in the area.
- l. On the night of August 26, 2025, the proposed beneficiary left his house and was approached by two men on a motorcycle. It was reported that the subjects called him a “dead man”; accused him of being a ‘snitch’; told him he should have left Barrancabermeja; and that he should not report any facts because “it would be worse for him.” It was added that the subjects warned him that they would cut out his guts and hang them up for being a snitch, for reporting them. They told him that they belonged to an “armed group” and that he should have gone to the San Miguel del Tigre intersection to receive information. It was revealed that they also threatened him with firearms and forced him to hand over his cell phone, which contained evidence and documents from previous complaints. The request stated that they seek to end his life because of his work as a human rights defender and his sexual orientation. He warned that he and his family must clandestinely move in hiding out of fear.

8. The request stated that the facts were reported to authorities. The complaint filed with the 117th Judicial II Criminal Prosecutor's Office of Medellín on April 22, 2025, was attached. There are also complaints before the Office of the Attorney General (FGN) dated May 2; June 4, 6, 10, and 25; July 3; August 29; as well as September 4 and 6, 2025. On April 30, 2025, the proposed beneficiary requested to activate the protection route before the National Protection Unit (UNP). On May 21, 2025, the UNP reported that "there was a possible causal link between the alleged threats reported and the activity he carries out," and therefore requested that the Technical Risk Analysis Unit (CTAR) "conduct a risk level assessment," adding that "the National Police was not requested to implement preventive protection measures on his behalf, as the police do not have jurisdiction where he lives."

9. On June 6, 2025, the proposed beneficiary requested protection measures from the National Police at the Barrancabermeja Station, the Ombudsperson's Office, the UNP, the Victims Unit, and the Office of the Attorney General. To the latter institution, he reiterated his request on June 9, 2025. On July 4, 2025, he requested protection from the Ministry of National Defense. On June 18, 2025, the proposed beneficiary had an appointment for the risk assessment.⁴ On July 17, 2025, a UNP official reportedly stated that the resolution would take more than two months. Similarly, when he requested accompaniment by the National Police to make a statement, he was reportedly told that "they did not have any personnel available."

10. The applicants attached a series of documents relating to requests for protection submitted by Colombian state entities on behalf of the proposed beneficiary:

- a. On May 2, 2025, the **Office of the Attorney General** submitted a request for police protection to the Police Commander of Magdalena Medio. On June 10, 2025, the Office of the Attorney General requested protection from the Santander Police Department. Moreover, on May 2 and June 28, 2025, the Office of the Attorney General sent communications to the UNP, requesting that they "assess the reported situation of risk and provide the victim with the necessary protection measures." On September 4, 2025, the Office of the Attorney General sent a request for protection measures to the National Police.
- b. On May 15 and June 13, 2025, the **Ombudsperson's Office** sent official letters to the Office of the Attorney General, requesting an investigation into the allegations submitted by the proposed beneficiary. On May 15, 2025, the Ombudsperson's Office sent a request to the UNP requesting that they assess the proposed beneficiary's situation. That same day, they sent a statement to the National Police which read: "(...) considering the urgency and complexity of the matter, I would like to request that the entity you represent provide support and implement preventive measures in favor of Mr. JUAN PABLO GALVIS ARANGO" while the UNP evaluates his situation."
- c. On June 19, 2025, the **Office of the Inspector General** delivered a request for urgent protection to the UNP, noting: "1. To submit a report in which it establishes whether Mr. JUAN PABLO GALVIS ARANGO has been assigned some type of outline by the UNP. If the answer is positive, from when, what type of measures are assigned. 2. Explain the reasons why, as stated in this petition, no protection response has been provided in favor of Mr. JUAN PABLO GALVIS ARANGO."
- d. On June 24, 2025, the **Municipal Ombudsperson's Office of Barrancabermeja** sent an official letter to the Office of the Attorney General, the Colombian National Police, the UNP, and the Regional Ombudsperson's Office of Magdalena Medio, urging them to safeguard the life of the proposed beneficiary. On September 6, 2025, the Municipal Office of Barrancabermeja again sent an official letter to the Office of the Attorney General, UNP, and the Colombian National Police, stating:

"(...) There have been countless occasions when citizens have brought situations that endanger their lives and integrity to the attention of the public authorities, which they have described as 'a systematic pattern of threats, harassment, and physical attacks', all of which have been reported to the Public Prosecutor's Office, the police, and human rights

⁴ An email dated July 28, 2025 was attached, in which the UNP informs the proposed beneficiary: "(...) it is evident that the National Protection Unit is aware of your case. The entity is currently conducting an Individual Risk Assessment, and the result of the study will be communicated to you through notification of the administrative act, once the procedure established in Article 2.4.1.2.40 of Decree 1066 of 2015 has been completed (...)"

organizations, without any effective protective measures having been taken to date.’ These statements are cause for concern, which is why the Municipal Office of Barrancabermeja is urging the competent authorities to expedite the administrative procedures aimed at adopting protective measures against the aforementioned citizen.”

- e. On June 27, 2025, the **Government of Santander** sent a letter to the Mayor of Barrancabermeja, the Secretary of the Office of Barrancabermeja, the Office of the Attorney General, the Commander of the Magdalena Medio Police Department, and the UNP, requesting the reactivation of protection due to supervening events in favor of the proposed beneficiary. The letter was reiterated on July 8, 2025.
- f. On July 3, 2025, the **Directorate of Access to Justice and Human Rights of the District Mayor’s Office of Barrancabermeja** sent an official letter to the Office of the Attorney General, Magdalena Medio Police, UNP, and Municipal Office of Barrancabermeja, requesting the reactivation of the protection route in favor of the proposed beneficiary. On September 9, 2025, the Directorate of Access to Justice and Human Rights of Barrancabermeja once again sent an official letter to the Presidential Council for Human Rights and International Humanitarian Law, the Office of the Attorney General, the Magdalena Medio Police, the UNP, the Santander Governor’s Office, the Municipal Office of Barrancabermeja, and the Office of the Inspector General of Barrancabermeja. The letter also requested the activation of the protection route in favor of the proposed beneficiary due to the kidnapping.
- g. On July 10, 2025, the **Victims Unit** issued Resolution No. 2025-67919, in which it analyzed that “there is evidence of sufficient elements to determine the occurrence of the victimizing event reported, as well as the presence and actions of various armed groups in the territory, during the period of time in which the event declared by the deponent occurred, within the framework of a close and sufficient relationship with the internal armed conflict, for which reason it is legally viable to include Mr. Juan Pablo Galvis Arango (...) together with his related family nucleus, and to recognize the three threatening events, the first occurring on April 10, 2025, the second on April 14, 2025, and the third on April 24, 2025, in the Single Victims Registry (RUV),” due to the actions of alleged armed groups.⁵

11. Lastly, the applicants reported that, as of July 9, 2025, under pressure from the governor’s office, the Magdalena Medio Police were “forced” to conduct searches of his residence. A statement issued on July 9, 2025, by the Magdalena Medio Police was attached, stating that: “(...) as of today and for a period of five (5) months, preventive measures will be implemented consisting of sporadic searches of the place of residence and/or work, telephone calls through the quadrants or the person responsible for the preventive measure (...)”. However, the applicants stated that they only went twice in the entire month of July, took one photo, and had the proposed beneficiary sign a form. On September 27, 2025, the proposed beneficiary stated that the police no longer patrol the area and that he is in a state of complete vulnerability. The applicants warned that, despite the fact that various state entities are aware of the risk he faces, he is not receiving adequate protection measures from the State.

B. Response from the State

12. The State emphasized its commitment to continue taking the necessary steps within the framework of the precautionary measures. In this regard, it attached a report from the Santander Governor’s Office dated August 25, 2025, which states that “according to information provided by the Ministry of Foreign Affairs, there are no new threats to the reactivation of the route due to subsequent events.”

13. For its part, through a report dated August 19, 2025, the Special Administrative Unit for Comprehensive Care and Reparation for Victims (Unit for Victims or UARIV) stated the following:

⁵ The Unit assessed that, in the municipality of Barrancabermeja, in the department of Santander, there is a presence of armed actors who have a strategic interest in the region, as it has strategic value due to its commercial connections. The Unit indicated that “there is evidence of underlying factors related to the presence of these armed actors, due to the integration of the territory into illegal economic chains, including extortion, arms trafficking, and fuel theft.” It also noted that in the municipality of Barrancabermeja (Santander), there is an ongoing dispute between illegal armed groups with strategic military interests in the region, as it is a strategic location for generating income and consolidating armed groups, who are fighting for effective control over the territory and the population, causing serious human rights violations and breaches of international humanitarian law.

- a. Juan Pablo Galvis Arango (proposed beneficiary) is included in the Official Victims Registry for the victimizing acts of threats that occurred on April 10, 14, and 24, 2025, in the municipality of Barrancabermeja (Santander).
- b. María del Rocío Arango Ospina (mother) is included in the RUV due to the victimizing events of anti-personnel mines, unexploded ordnance, and improvised explosive devices, which occurred on December 17, 2008, in the municipality of El Tarra (Norte de Santander).
- c. Elkin Didian Galvis Arango (brother) is included in the RUV for the victimizing act of threats, carried out on April 10, 14, and 24, 2025, in the municipality of Barrancabermeja (Santander).
- d. Hilberth Alexander Galvis Arango (brother), Elvar Alfredo Galvis Arango (brother), and Luis Alfredo Galvis Agudelo (father) are not included in the RUV.

14. The previous report also mentioned that the Reparations Directorate stated that, after consulting the INDEMNIZA and MAARIV (Model for Comprehensive Care, Assistance, and Reparations for Victims) systems to determine the reparations measures for the proposed beneficiaries, it was noted that none of the proposed beneficiaries had submitted a request for reparations measures.⁶

15. In an official letter dated September 2, 2025, the Directorate of Access to Justice and Human Rights of the Mayor's Office of Barrancabermeja reported that on July 3, 2025, it requested the reactivation of the protection route in favor of the proposed beneficiary before the Sectional Director of Magdalena Medio, Magdalena Medio Police, the Magdalena Medio UNP Liaison, the Municipal Ombudsperson's Office of Barrancabermeja, the Interior Secretariat, and the Peace and Human Rights Group. In particular, it indicated that the institution requested the Office of the Attorney General to "follow up on the investigation process within the framework of criminal law, in order to clarify the facts." It requested that the Magdalena Medio police force "move forward with the reactivation of the institutional route of the National Police, in order to provide the necessary protection measures to guarantee the life, health, and safety of Mr. Juan Pablo Galvis Arango." Moreover, the UNP was required to "advance the administrative procedures of the protection program, in order to guarantee life and integrity."

16. Through an official letter dated August 29, 2025, the District Secretariat for Security and Coexistence (*Secretaría Distrital de Seguridad y Convivencia*) of the Mayor's Office of Barrancabermeja, stated that the complaint filed by the proposed beneficiary was forwarded to the Magdalena Medio police force, UNP, and Mayor's Office of Bucaramanga for necessary measures. The Secretariat also specified that this case had already been referred to the UNP and the National Police at the request of the Ministry of the Interior in June and followed up in July 2025. In response, the National Police announced the activation of institutional or inter-institutional procedures, preventive measures and personal security, and requested a risk assessment from the UNP.

17. On September 11, 2025, the Ombudsperson's Office stated that requests had been sent to the Prosecutor's Office to obtain copies of the Search Mechanism and the transfer of a complaint for alleged threats against the life of the proposed beneficiary, filed on several occasions; as well as referrals to the Office of the Inspector General for the purpose of monitoring judicial proceedings, and requests to the UNP to guarantee the safety of the citizen and his family. It was also reported that during May and June 2025, the proposed beneficiary had sent several petitions to the Antioquia Regional Ombudsperson's Office by email, which had been duly forwarded.

18. The Ministry of National Defense reported that, on August 5, 2025, it forwarded the complaint regarding the serious security situation that the proposed beneficiary faced; on August 6, 7, 8, and 11, 2025, it

⁶ In this regard, the Reparations Directorate stated that, in accordance with Article 7 of Resolution 1049 of 2019, administrative compensation is granted at the request of the party and not ex officio. Therefore, in order to access this measure, the person recognized as a victim in the RUV must submit a request through any of the citizen service channels provided by the Victims Unit. It also stated that, based on Article 3 of the aforementioned, the victimizing act of threat is not subject to administrative compensation. Lastly, it added that the Directorate of Social and Humanitarian Management stated that the proposed beneficiaries have not been beneficiaries of humanitarian assistance measures.

forwarded the complaints signed by him; and on August 11, 2025, it issued a response to the complaint regarding the security situation.⁷ It also reported that the Magdalena Medio Police executed the following preventive activities in favor of the proposed beneficiary:

- a. May 16, 2025: request to the UNP, the Barrancabermeja Security Council, coordination with military forces, and report to the Barrancabermeja Office of the Inspector General.
- b. May 16, 2025: order of preventive measure and coordination meeting with the proposed beneficiary.
- c. June 13; July 11, 17, 25 and 31; August 8, 13, and 15, 2025: police inspections and rounds.
- d. July 9, 2025: recommendations for self-protection.
- e. July 25, 2025: Committee for Coexistence and Citizen Security in Barrancabermeja.

19. The State reported that the Magdalena Medio Police Department Command has been developing police action parameters for the deployment of the Strategy for Assistance to Vulnerable Populations (*Estrategia de Atención a Poblaciones en Situación de Vulnerabilidad*, ESPOV), which are registered in the Comprehensive Human Rights System (SIDEH). It was indicated that the Human Rights Group of the Magdalena Medio Police Department and the police patrol are carrying out coordination, attention, and institutional response actions, conducting reviews, police patrols, and establishing spaces for dialogue with the proposed beneficiary, thus promoting assertive communication and providing a differential approach.

20. In another development, the Internal Control and Disciplinary Office of the Magdalena Medio Police Department announced that it had opened a disciplinary investigation, which is currently in the preliminary inquiry stage, based on the proposed beneficiary's allegations regarding alleged acts of corruption by National Police officials. In addition to the above, the Citizen Services Office reported that, once the Information System for Petitions, Complaints, Claims, and Suggestions (SIPQR2S) had been verified, the following records submitted by the proposed beneficiary were shown: (i) complaint: dissatisfaction with the service/deficiency in police service/dissatisfaction with police procedures;⁸ (ii) petition: citizen information/request for information/guidance on procedures, formalities, and requirements; (iii) petition: citizen information/request for information/information on institutional procedures.

21. For its part, on September 18, 2025, the UNP stated that all the complaints have been handled, as well as the facts of risk related to this entity related to the proposed beneficiary. As a result, the UNP pointed out that in 2025, a risk level assessment was conducted in the proposed beneficiary's favor for the first time. It stated that the technical phase of the assessment has been completed and it is currently in the process of being submitted to the Committee for Risk Assessment and Recommendation of Measures (CERREM) so that it can subsequently be implemented through the issuance of the corresponding resolution and formal notification to the citizen of the decision taken. The UNP also reported that it responded by email to the various communications received regarding the proposed beneficiary's situation.⁹

⁷ The report added that the Magdalena Medio police force has implemented institutional preventive and protection measures in favor of leaders, upholding the principles of complementarity, concurrence, tranquility, and citizen security, and establishing guidelines for the effective protection of the rights of human rights defenders, their organizations, and members of social and political movements, among others. He stated that to date, 104 coordination meetings have been held with local authorities.

⁸ It was clarified that, in accordance with the guidelines on the "Handling of Complaints and Claims in the National Police," complaints filed with the institution do not constitute disciplinary, criminal, or administrative records, have no executive merit, and do not become *res judicata*. In this regard, it was indicated that these factors will not be taken into account as criteria for evaluating or determining the behavior or performance of members of the institution, and that it is the obligation of the National Police to guarantee respect for the fundamental rights to the presumption of innocence, good name, privacy, honor, habeas data, and due process. In this regard, it was clarified that the personal data of officials who are the subject of complaints, for which no disciplinary decision has been made, will be kept confidential and will not be subject to requests from judicial, legislative, and administrative authorities that are constitutionally or legally competent and request this information for the proper exercise of their functions in accordance with internal regulations.

⁹ In particular on April 29; May 4, 5, 14, 21, 29, 31; and June 4, 2025.

22. The State explained the procedure for initiating the route and adopting material protection measures, if applicable, in accordance with the Prevention and Protection Program described in Decree 1066 of 2015.¹⁰

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

23. The precautionary measures mechanism is part of the Commission's function of overseeing compliance with the human rights obligations set forth in Article 41(b) of the American Convention on Human Rights, also included in Article 18(b) of the Statute of the IACHR. The precautionary measures mechanism is described in Article 25 of the Rules of Procedure of the Commission. 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 people.

24. 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 protect the exercise of human rights.¹² To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and how vulnerable the persons proposed as beneficiaries would be left in case the measures are not adopted.¹³ Regarding 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;

¹⁰ In this regard, the following was detailed: a. Receipt of the request for protection and completion of the registration form, including verification of the minimum requirements established; b. Analysis of the applicant's membership in the population covered by the protection program and verification of the causal link between the risk and the activity the applicant carries out; c. Initiation of the risk assessment procedure by the Risk Level Assessment Committee; d. Submission of the risk assessment results to CERREM within no more than 30 working days, as from the moment the applicant expresses consent for inclusion in the program; e. Analysis and assessment of the case, and recommendation of measures by the respective committee; f. Adoption of the committee's recommendation by the director of the UNP through a motivated administrative act, which will be communicated to the protected person in writing; g. Implementation of the protection measures, for which the competent entity will sign a certificate confirming their delivery to the protected person; h. Monitoring of the implementation and use of protective measures; and i. Reassessment of the level of risk, for which the UNP will establish an abbreviated procedure.

¹¹ Inter-American Court of Human Rights (I/A Court H.R.), Matter of the Yare I and Yare II Capital Region Penitentiary Center (Yare Prison), 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 (Available only in Spanish).

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 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).

- 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.

25. 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 resolved without entering into determinations on the merits.¹⁷

26. Moreover, when assessing the alleged facts, the Commission takes into account the Colombian context. In its Annual Reports for 2021, 2022, 2023, and 2024, the Commission reiterated its concern about the violence resulting from the armed conflict in the country and its particular impact on human rights defenders, social leaders, indigenous and Afro-descendant peoples, peasant communities, women, children and adolescents.¹⁸ In particular, in its 2024 Annual Report, the IACHR warned that, despite these efforts, levels of violence remain high across the country. Until November 2024, 26 early alerts had been issued for 24 departments, 123 municipalities and 15 non-municipal areas concerning human rights violations by armed groups and their links to drug trafficking, illegal mining and deforestation.¹⁹ In this regard, between January and October 2024, the Ombudsperson’s Office recorded 147 murders of human rights defenders or leaders, with the departments of Arauca, Cauca, and Valle del Cauca having the highest rates of murder.²⁰ The Commission highlighted reports from civil society organizations concerning deficiencies in protection measures. These include material shortcomings in vehicles, protection vests, telephones, and panic buttons; mobility restrictions on protection officers’ mobility and fuel supply; lack of institutional presence in the territory; insufficient qualified personnel; and the absence of measures with a gender, ethnic-racial, and territorial approaches. These issues have hindered the effective implementation of protection measures.²¹

27. Furthermore, following its on-site visit to Colombia in April 2024, the Commission noted in its Preliminary Observations that the reconfiguration of the armed conflict has led to an alarming number of murders, threats, harassment, and stigmatization, particularly against human rights defenders and social and community leaders, signatories to the Peace Agreement, and journalists.²² In addition, the IACHR noted the

¹⁵ 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.

¹⁶ 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.

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.” 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).

¹⁸ IACHR, 2024 Annual Report, Ch. X. Colombia, OEA/Ser.L/V/II. Doc. 39 rev. 2, March 26, 2025, para. 257, p. 27.

¹⁹ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 263, p. 529.

²⁰ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 266, p. 529.

²¹ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 269, p. 530.

²² IACHR, Preliminary Observations, On-site Visit to Colombia, April 15-19, 2024, page 3 (Available only in Spanish).

persistence of violence against the LGBTI population and the obstacles they face in accessing justice, especially in territories affected by the conflict.²³

28. In addition, the Commission has highlighted that human rights defenders of people who are part of the LGBTI community are more vulnerable to violence due to three factors: (i) people who identify as LGBTI face a greater risk of violence due to prejudices against their sexual orientation and/or gender identity; (ii) those who defend and promote the human rights of the LGBTI community experience additional vulnerability to violence because of their role as defenders and the causes they advocate; (iii) defenders who also identify as LGBTI and work to protect and promote the human rights of sexual diversity face alarmingly high levels of vulnerability, created by the intersection of their sexual orientation and/or gender identity, their role as defenders, and the issues on which they work.²⁴

29. Consequently, the Commission understands that the circumstances that the proposed beneficiary faces, along with the country contextual and thematic monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements.

30. With regard to the requirement of *seriousness*, the Commission considers that this has been met, given that the proposed beneficiary works as a human rights defender in his region and, as a result, has been the target of multiple attacks against him so far in 2025. The Commission understands that these events have continued to occur over time with particular intensity, including:

- a) repeated death threats via phone calls and in person in an attempt to stop him from carrying out his work;
- b) warnings about explicit forms of torture against him such as that “they would cut out his guts and hang them up for being a snitch”;
- c) harassment and monitoring by unknown persons on motorcycles;
- d) insults due to his sexual orientation;
- e) shots fired at him;
- f) beatings with a weapon;
- g) being held by a group identified as “Los Búcaros,” which was classified as “kidnapping”;
- h) individuals forced him to hand over his cell phone, which contained evidence and documents of previous complaints that the proposed beneficiary had filed;
- i) displacements for fear of being killed;
- j) the individuals who allegedly made the threats claimed to know where the proposed beneficiary lives, with whom, where he goes, how he gets around, and details about his family. In addition, they allegedly have information about the complaints he filed and the license plates of the vehicles that reportedly helped him on one occasion.

31. The Commission understands that the continuity and seriousness of the acts to which the proposed beneficiary has been subjected show the persistence and methods used by non-state actors with a view of preventing him from continuing his denouncing activities, as well as hindering his work in defense of human rights. In addition, various state entities have repeatedly requested protection in his favor in 2025. These include: the Office of the Attorney General, the National Police, the Office of the Inspector General, the Ombudsperson’s Office, the Barrancabermeja Municipal Ombudsperson’s Office, the Santander Governor’s Office and the Directorate of Access to Justice and Human Rights of the District Mayor’s Office of Barrancabermeja.

32. Although it was reported that on July 9, 2025, the Magdalena Medio Police Department ordered sporadic visits to the proposed beneficiary’s residence, the applicants revealed that the police are no longer conducting these patrols and that he is completely unprotected. In this regard, the Commission also observes that the State reported the existence of a complaint filed by the proposed beneficiary regarding deficiencies in police

²³ IACHR, Preliminary Observations. On-site visit to Colombia, previously cited, page 13-14 (Available only in Spanish).

²⁴ IACHR, Violence against Lesbian, Gay, Bisexual, Trans and Intersex Persons in the Americas, OAS/Ser.L/V/II. Rev 2Doc. 36, November 12, 2015, par 335.

services and dissatisfaction with police procedures. However, there is no information available to assess the actions taken in response to this complaint or whether additional measures were implemented to mitigate the situation brought to their attention.

33. Notwithstanding the foregoing, the Commission recognizes that, given the nature of the acts of violence the proposed beneficiary has been facing, additional protection measures that go beyond visits to his residence are necessary. The foregoing to the extent that the violent incidents occurred while he was traveling, at times when he was away from his residence. In this regard, the Commission finds that the proposed beneficiary reportedly requested to activate the protection route before the UNP on April 30, 2025. Since then, more than five months have elapsed, and no resolution has been issued nor has there been an estimated date for it. This situation is particularly concerning given that the passage of time without the necessary guarantees increases the likelihood that the reported risk will materialize to the detriment of the proposed beneficiary's rights.

34. The Commission specifies that it is not called upon, at this time, to detail the concrete measures that should be implemented to protect the proposed beneficiary. However, in order to assist in defining the most appropriate measures, it considers it necessary to adopt protective measures in his favor in light of the reported facts and the persistence of risk events over time in the context of his work as a human rights defender and his efforts to locate his missing father, and to enable him to safely carry out his work. This assessment is essential since, according to the information available, the measures taken so far have not effectively mitigated the ongoing risks he faces. Therefore, the Commission warns that, given the nature of the alleged facts over time, the State must conduct a more comprehensive assessment of the risk situation faced by the proposed beneficiary, with the aim of identifying the underlying causes of the threat.

35. In relation to the investigations, the Commission observes that the facts have been reported to the Office of the Attorney General. However, after requesting information from the State, it did not provide details about progress in identifying those responsible for the reported incidents, nor about the adoption of appropriate measures to guarantee the safety of the proposed beneficiary. The lack of concrete results in investigations limits the ability to mitigate risk and perpetuates a context of vulnerability.²⁵ The aforementioned is relevant when assessing the safety of the proposed beneficiary and the likelihood that the threats, being followed, harassment, and reported incidents will recur.

36. Taking into account the foregoing, the Commission finds that, from the applicable *prima facie* standard, it is sufficiently proved that the rights to life and personal integrity of the proposed beneficiary are at serious risk.

37. With regard to the requirement of *urgency*, the Commission considers that this has been met, given that the proposed beneficiary has been subjected to threats, surveillance, harassment, displacement, and acts of armed violence against him, which have not ceased over time. The Commission notes that, despite the fact that the proposed beneficiary requested the activation of the protection route in April 2025, to date, he has still not received effective and sufficient protection measures to safeguard his security in the context of his work as a defender. Therefore, given the imminent materialization of the risk and the absence of protection measures effectively implemented, it is necessary to adopt immediate measures to safeguard his rights to life and personal integrity.

38. Regarding the requirement of *irreparable harm*, the Commission concludes it met, given that the potential impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

²⁵ IACHR, Resolution No. 49/2025, Precautionary Measures No. 262-24, Dumar Eliecer Blanco Ruiz regarding Colombia, July 21, 2025, para. 35.

39. Lastly, the Commission notes that the protection of the rights of the proposed beneficiary's family has also been requested. However, upon analyzing the available information, the Commission does not have sufficient evidence at this time to justify the requirements of Article 25 of its Rules of Procedure in its favor. The foregoing, in the understanding that the facts submitted have focused on the proposed beneficiary. Notwithstanding, the Commission recalls that the State of Colombia must guarantee their rights under the terms of Article 1 (1) of the American Convention on Human Rights. These obligations remain in force regardless of the decision regarding the situations surrounding the family members.

V. BENEFICIARIES

40. The Commission declares Juan Pablo Galvis Arango as the beneficiary of the precautionary measures, who is duly identified in this proceeding.

VI. DECISION

41. The IACHR 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 Colombia:

- a) adopt the necessary measures to protect the rights to life and integrity of Juan Pablo Galvis Arango;
- b) implement the necessary measures so that the beneficiary can carry out his activities as a human rights defender without being subjected to threats, harassment, or other acts of violence in the exercise of his work;
- c) consult and agree upon the measures to be adopted with the beneficiary and his representatives; and
- d) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

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

43. 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.

44. The Commission instructs its Executive Secretariat to notify this resolution to the State of Colombia and the applicants.

45. Approved on October 10, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Edgar Stuardo Ralón Orellana; Roberta Clarke; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary