

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 47/2025**

Precautionary Measure No. 752-25  
Noel Vidal Álvarez Camargo regarding Venezuela  
July 10, 2025  
Original: Spanish

**I. INTRODUCTION**

1. On June 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 the CASLA Institute (“the applicant”) urging the Commission to require that the State of Venezuela (“the State” or “Venezuela”) adopt the necessary measures to protect the rights to life and personal integrity of Noel Vidal Álvarez Camargo (“the proposed beneficiary”). According to the request, the proposed beneficiary is an opposition leader in the country. Agents of the Bolivarian National Intelligence Service (SEBIN) allegedly detained him on January 10, 2025 and no information regarding his whereabouts was initially available after being detained. Subsequently, after being allowed visitors, he has been held incommunicado since March 11, 2025. It was alleged the progressive deterioration of his health was observed.

2. Pursuant to Article 25(5) of its Rules of Procedure, the IACHR requested information from the State on June 11, 2025. To date, the IACHR has not received a response from Venezuela and the granted deadline has expired.

3. Upon analyzing the submissions of fact and law furnished by the applicant, the Commission considers that Noel Vidal Álvarez Camargo is in a serious and urgent situation, given that his rights to life, personal integrity, and health 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, personal integrity, and health of Noel Vidal Álvarez Camargo; b) implement sufficient measures to ensure that the beneficiary’s detention conditions are compatible with applicable international standards. In particular, immediately carry out a medical assessment of his health situation and guarantee access to specialized medical care, as well as the necessary treatments; guarantee regular contact with his family and trusted lawyers; and report on the status of the charges brought against him including the reason why he has not been released pending trial; 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 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. The proposed beneficiary is a senior citizen (65 years old). He is reportedly known for his leadership in the business sector and opposition-led political activism within the country. He was president of *Fedecámaras* between 2009 and 2011, and national coordinator of the political party *Gente*. He headed the *Con Venezuela* Command in Miranda state during the 2024 presidential campaign in the country.

5. On January 10, 2025, the same day that President Nicolás Maduro took office, the proposed beneficiary was at a friend’s residence in the municipality of Baruta, in the state of Miranda. At midday, ten armed individuals identified as SEBIN officials arrived at the residence in vehicles without license plates. The

proposed beneficiary was reportedly detained without informing the reason or where he would be taken. The request added that prior to being detained, the proposed beneficiary sent an audio message warning that SEBIN officials were at the residence.

6. It was alleged that the proposed beneficiary was missing from the day he was detained until February 7, 2025, during which time his family members and attorney attempted to locate him by visiting the headquarters of intelligence agencies, where officials allegedly refused to provide information about his whereabouts. After locating him, his son was permitted to visit him at the Helicoide on February 7, 2025, under conditions strictly monitored and recorded by State officials. During that visit, the proposed beneficiary reportedly told him that, during the first 24 hours of his detention, he was held in a “clandestine torture center” in Santa Monica. Moreover, he allegedly remained hooded for 24 hours near a dog, whose barking and aggressive breathing frightened him. The proposed beneficiary reported being beaten on the body and face by public officials, who also subjected him to abusive and offensive language. He informed his son that on January 11, 2025, he was transferred to the Helicoide to be interrogated and psychologically tortured.

7. The request stated that, on January 15, 2025, an online filing hearing was held before the Third Trial Court of with Jurisdiction over Crimes Related to Terrorism, during which the offenses of incitement to hatred, conspiracy, and terrorism were preliminarily classified. The three crimes were confirmed on May 12, 2025, in a preliminary hearing, also held online. The applicant alleged that the Third Court with Jurisdiction over Terrorism disregarded the appointment of a new legal counsel the proposed beneficiary made on February 7, 2025, thereby hindering his ability to mount an adequate defense against the charges brought against him. It is indicated that the appointment has not been effective to date. It was added that the appointment of the new legal counsel was made in the presence of the director of the SEBIN.

8. On March 11, 2025, the private attorney visited the proposed beneficiary in the Helicoide in a visit that only lasted a few minutes. This was the last time the proposed beneficiary was contacted, despite the requests for information that his attorney had issued to the State authorities. Since then, the proposed beneficiary has been held incommunicado.

9. The request indicated that, according to information received through third parties, the proposed beneficiary was experiencing a progressive deterioration in his health, despite having been in good physical condition prior to his detention. Specifically, it was reported that the proposed beneficiary has the following conditions: lumbar issues, undiagnosed abdominal pain, dental complications including infections and bone resorption, kidney gravel, acute inflammation of the colon (which could compromise his digestive system and potentially progress to severe colitis, internal bleeding, and intestinal perforation), and prostate-related problems manifested as intense pain, difficulty urinating, and signs of urinary retention (which could lead to infections and urinary obstructions). Similarly, it was reported that, prior to his incommunicado detention in March 2025, the proposed beneficiary had experienced urinary and intestinal obstructions, which required the placement of a catheter which was initially temporary, and later determined as permanent. The applicant reported not knowing where or who provides this medical care. In addition, it was alleged that the proposed beneficiary is not receiving specialized medical care.

10. The request indicated that two appeals for protection of constitutional rights (*amparo*) have been filed regarding the alleged facts before the Constitutional Chamber of the Supreme Court of Justice. The first was filed on March 21, 2025, alleging violation of the right to defense, due process, and access to justice. The second appeal was filed on May 2, 2025, for threats to physical integrity and violation of the right to health, due to the clinical condition of severe colon inflammation, prostate problems, and dental problems that the proposed beneficiary presents. In this *amparo* action, it was requested that the Court order measures to ensure access to specialized and timely medical care, specifically that the proposed beneficiary be transferred to a specialized health center for diagnostic tests and evaluation of the treatments required for his full recovery. Moreover, the attorney appointed by the proposed beneficiary was required to be sworn in order to be able to

exercise his right to defense and submit the necessary health requests to procure the physical and mental integrity of his client. To date, neither of the two *amparo* actions has received a response from the Court.

## **B. Response from the State**

11. On June 11, 2025, the Commission requested information from the State. However, despite the expiration of the given deadline, the State has not submitted its response to date.

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

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

13. The Inter-American Commission and the Inter-American Court of Human Rights (hereinafter "the Inter-American Court" or "I/A Court H.R.") have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.<sup>1</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>2</sup> To do this, the IACHR shall assess the problem raised, the effectiveness of State actions to address the situation, and how vulnerable the proposed beneficiaries would be left in case the measures are not adopted.<sup>3</sup> As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits, and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect (*effet utile*) of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.<sup>4</sup> In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

- a. "serious situation" refers to a grave impact that an action or omission can have on a protected right or on the eventual effect of a pending decision in a case or petition before the organs of the inter-American system;

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

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

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

<sup>4</sup> I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 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.

14. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt; rather, the information provided should be assessed from a *prima facie* standard of review to determine whether a serious and urgent situation exists.<sup>5</sup> Similarly, the Commission recalls that, by its own mandate, it is not in its purview to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.<sup>6</sup> This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be carried out without making any determination on the merits.<sup>7</sup>

15. As regards the context, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,<sup>8</sup> and has included the country in Chapter IV.B of its Annual Report. The Commission has also issued press releases and country reports, and established a special follow-up mechanism for the country, known as MESEVE.

16. In 2024, the Commission condemned the practices of institutional violence in the context of the electoral process in Venezuela, such as violent repression, arbitrary detentions, and political persecution.<sup>9</sup> The strategy of detention and criminalization appears to be specifically targeted at individuals perceived as opponents of the regime, including journalists, opposition leaders, human rights defenders, and others.<sup>10</sup> On December 27, 2024, the IACHR approved the report titled “Venezuela: Serious Human Rights Violations in Connection with the Elections” and reaffirmed that the State has been engaging in practices such as the arbitrary detention of opponents, human rights defenders, and social leaders,<sup>11</sup> while using “terror as a tool of social control.”<sup>12</sup>

17. On January 9, 2025, the Commission learned of arbitrary detentions carried out days before the peaceful protests called by the opposition. These acts represent a new wave of the repressive pattern.<sup>13</sup>

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

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

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

<sup>8</sup> IACHR, [2023 Annual Report, Ch. IV.b. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023.

<sup>9</sup> IACHR, Press Release 184/24, [IACHR and SRFOE condemn State terrorism practices in Venezuela](#), August 15, 2024.

<sup>10</sup> IACHR, Press Release 184/24, previously cited.

<sup>11</sup> IACHR, [Venezuela: Serious Human Rights Violations in Connection with the Elections](#), OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3.

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

<sup>13</sup> IACHR, Press Release 09/25, [The IACHR condemns the ongoing practices of state terrorism in Venezuela and recalls that María Corina Machado is a beneficiary of precautionary measures](#), January 9, 2025.

Furthermore, it urged the State of Venezuela to immediately cease the persecution of opponents, human rights defenders, and journalists, and to promptly release all individuals detained for political reasons.<sup>14</sup>

18. Therefore, the Commission understands that the circumstances in which the detention of the proposed beneficiary has taken place, along with the country contextual monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements.

19. As for the requirement of *seriousness*, the Commission considers that it has been met. When analyzing the proposed beneficiary's situation, the Commission identifies that the current detention of the proposed beneficiary occurs in the context of persecution of the Venezuelan opposition. In this context, the Commission weighs the following:

- It was alleged that the proposed beneficiary was detained on January 10, 2025, without any known grounds or information on his destination.
- Approximately a month later, his son was able to visit him and obtain information on his situation. Prior to this meeting, his family members did not have any official information about his place of detention, which led to several attempts to locate him.
- During that visit, the proposed beneficiary reported that he had been beaten in downtown Santa Monica and subsequently interrogated at the Helicoide. These acts were classified in the request as acts of torture, which included intimidation with a dog, as well as physical and verbal aggression by the custodians.
- There is no information available as to whether these allegations have been investigated to date, or whether the proposed beneficiary has been assessed by medical personnel for possible health consequences resulting from these alleged acts.
- The applicant alleged a series of facts pointing to a lack of effective response by the State regarding the situation of the proposed beneficiary, despite the efforts made by his family members and his private lawyer. This is reflected in the State's refusal to officially inform where he was initially detained; and the resistance to accept the appointment of his new legal counsel on February 7, 2025, which remains unresolved. Lastly, it highlights the absence of a ruling on the appeal for protection filed in March 2025 before the Constitutional Chamber of the Supreme Court of Justice, which questions the legal process that led to the proposed beneficiary being deprived of his liberty.
- In addition to the above, it is understood that, since March 11, 2025, the proposed beneficiary remains incommunicado with the outside world. Since that date, the applicant has no information on the detention conditions, his health, or the course of the legal remedies filed. The situation, in the context of Venezuela described in the preceding paragraphs, leads the Commission to believe that the proposed beneficiary is in a vulnerable situation with regard to the risks he may currently face while in State custody. In this regard, the Commission recalls that the Inter-American Court has indicated in other matters that "detention without communication not only makes it impossible to verify the current situation of the proposed beneficiaries, their conditions of detention, and their health status, but it also implies a curtailment of the procedural guarantees of all detainees."<sup>15</sup>

<sup>14</sup> IACHR, Press Release 09/25, previously cited.

<sup>15</sup> I/A Court H.R., Matter of Juan Sebastián Chamorro et al. regarding Nicaragua, Provisional Measures, Resolution of June 24, 2021, paragraph 36 (Available only in Spanish).



- Complete information on the health status of the proposed beneficiary is not available. The request indicates that no diagnosis has been made to determine the state of his medical issues, and alleges that the State has not responded to requests for information about his health or whether he is receiving medical care. It is noted that the applicant filed an *amparo* action on May 2, 2025, seeking specialized and timely medical care for the proposed beneficiary. However, this request has not yet been substantiated by the competent court.
- Insofar as the trusted attorney has not been able to establish himself as his formal defense counsel, the applicant argued that it is not possible to activate additional remedies to protect his rights. The foregoing is in addition to the fact that the applicant and his relatives do not have information on his current situation given the incommunicado detention.
- The applicant acknowledged that they are aware of the proposed beneficiary's progressive health deterioration. While in custody, the applicant alleged that the proposed beneficiary had been operated on to have a permanent catheter inserted. However, they lack information regarding the nature of the procedure and the care that would have been provided.

20. In light of the previous assessments, this Commission considers that the proposed beneficiary is at serious risk while being deprived of his liberty in the conditions described. The Commission also considers it important to highlight that the proposed beneficiary is a senior citizen who requires special care due to the ailments associated with his age and the circumstances of his detention, which place him in a position of greater vulnerability.

21. 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, particularly with regard to his health. Therefore, the Commission does not have elements that would allow it to dispute the facts alleged by the applicant, nor to assess whether the risk that the proposed beneficiary faces has been addressed or mitigated. Moreover, the Commission expresses its particular concern given that State agents, who hold a special responsibility as guarantors of human rights, have been identified as reportedly responsible for allegations of torture, since they have him in their custody.

22. In light of the foregoing considerations, the Commission concludes that, based on the applicable *prima facie* standard, the right to life, personal integrity, and health of the proposed beneficiary are at serious risk, given that his detention conditions and health remain unknown to date after being detained on January 10, 2025, and his subsequent incommunicado detention on March 11.

23. With regard to the requirement of *urgency*, the Commission deems that it has been met given that, should the proposed beneficiary continue to face the situation described, he is likely to be exposed to a greater impact on his rights. Therefore, the Commission warns that, considering the proposed beneficiary's deprivation of liberty, absence of communication with his family and trusted legal counsel, lack of information regarding medical care to assess his health status and necessary treatment, as well as his age, there is a significant risk that the danger could materialize at any moment. In addition, the Commission does not have information from the State to assess the actions that are being taken to address and mitigate the alleged risk faced by the proposed beneficiary. Therefore, it is necessary to adopt immediate measures to safeguard his rights to life, personal integrity, and health.

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

#### **IV. BENEFICIARY**

25. The Commission declares Noel Vidal Álvarez Camargo as beneficiary of the precautionary measures, who is duly identified in these proceedings in accordance with subsection 6(b) of Article 25 of the IACHR Rules of Procedure.

#### **IV. DECISION**

26. The 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, the Commission requests that Venezuela:

- a) adopt the necessary measures to protect the rights to life, personal integrity, and health of Noel Vidal Álvarez Camargo;
- b) implement sufficient measures to ensure that the beneficiary's detention conditions are compatible with applicable international standards. In particular, immediately carry out a medical assessment of his health situation and guarantee access to specialized medical care, as well as the necessary treatments; guarantee regular contact with his family and trusted lawyers; and report on the status of the charges brought against him including the reason why he has not been released pending trial;
- 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 events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

27. The Commission requests that Venezuela inform the Commission, within a period of 20 days from the date of this communication, on the adoption of the precautionary measures agreed upon and to periodically update this information.

28. The Commission stresses that, pursuant to Article 25(8) of the Commission's 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.

29. The Commission instructs the Executive Secretariat of the IACHR to notify this resolution to the State of Venezuela and the applicant.

30. Approved on July 10, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR

Tania Reneaum Panszi  
Executive Secretary