
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 65/2025**

Precautionary Measure No. 1230-25

Armando José Bermúdez Mojica *et al.* regarding Nicaragua

September 16, 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 presented by *Asociación Unidad de Defensa Jurídica, Registro y Memoria para Nicaragua - AUDJUDRNIC* (“the requesting party”) urging the Commission to require that the State of Nicaragua (the “State” or “Nicaragua”) adopt the necessary measures to protect the rights to life and personal integrity of Armando José Bermúdez Mojica, Olga María Lara Rojas, Pedro José López Calero, Jessica María Palacios Vargas, and Rudy Antonio Palacios Vargas (“the proposed beneficiaries”). According to the request, on July 17, 2025, agents of the Special Operations Directorate of the National Police (DOEP) detained the proposed beneficiaries at their residences in Jinotepe, Carazo, in retaliation for belonging to a family that opposes and criticizes the Nicaraguan government. Since then, their family members and friends state that they have not received any information about their whereabouts or fate.

2. Pursuant to Article 25 (5) of the Rules of Procedure, the Commission requested information from the State on August 29, 2025. To date, the State has not replied to the Commission and the granted deadline has expired.

3. Upon analyzing the allegations of fact and law furnished by the applicants, the Commission considers that the information provided showed *prima facie* that the proposed beneficiaries were in a serious and urgent situation, given that their rights to life and personal integrity were at serious risk of irreparable harm. Consequently, Nicaragua is requested to: a) adopt the necessary measures to determine the situation and whereabouts of Armando José Bermúdez Mojica, Olga María Lara Rojas, Pedro José López Calero, Jessica María Palacios Vargas, and Rudy Antonio Palacios Vargas in order to protect their rights to life and personal integrity; b) formally indicate whether the beneficiaries have been charged with a crime and/or have been brought before the appropriate judicial authority; and if not, clarify the reason for their detention without charge and judicial supervision; c) clarify the circumstances and conditions of their detention, including the place of their detention, and whether they have access to their legal representatives and family, as well as the necessary health care; and d) report on the actions taken to investigate the alleged facts that led to the adoption of this resolution, so as to prevent such events from reoccurring.

II. BACKGROUND INFORMATION

4. Following the beginning of the crisis of the human rights situation in Nicaragua and the working visit carried out in May 2018, the Commission formed the Special Follow-up Mechanism for Nicaragua (MESENI) in order to follow up on the recommendations made to the State, as well as to maintain the respective monitoring for the purposes relevant to the mandates of the IACHR.¹ Similarly, the IACHR installed the Interdisciplinary Group of Independent Experts (GIEI) of Nicaragua, which issued a report that analyzed the

¹ IACHR, Press Release No. 134/18, [IACHR Issues Report on Nicaragua’s Serious Human Rights Situation](#), June 22, 2018; Press Release No. 135/18, [IACHR Launches Special Follow-up Mechanism for Nicaragua \(MESENI\)](#), June 25, 2018; Press Release No. 274/18, Press Release about Nicaragua, December 19, 2018; Press Release No. 113/20, [Two Years After Visit to Nicaragua, IACHR Condemns Lack of Compliance with its Recommendations and Calls on the State to Urgently Implement Them](#), May 16, 2020.

events that took place in April and May 2018.² For its part, the IACHR decided to include Nicaragua in its Annual Report in Chapter IV.b as of 2018, in accordance with the grounds established in its Rules of Procedure.³ In parallel, the Commission, under its monitoring mandate, has issued reports on the human rights situation in Nicaragua. These reports include a series of recommendations to the State aimed at ensuring the respect and protection of individuals' rights in accordance with its international obligations.⁴

5. In addition to the above, the Commission has consistently issued statements and included concerns in its annual report, highlighting the escalating crisis and serious human rights violations in the country from multiple perspectives. In addition, the Commission has addressed the persistence of acts of persecution;⁵ the intensification of surveillance, harassment, and selective repression against individuals seen as opponents of the government, human rights defenders, and independent journalists;⁶ the widespread impunity and the prolonged breakdown of the rule of law;⁷ the criminalization of opposition leaders;⁸ the deportation of people deprived of liberty due to political reasons and the loss of nationality;⁹ the confiscation of property, bank accounts, pensions, and other economic reprisals as a form of punishment and violence against those perceived as opponents of the regime¹⁰; the repressive escalation against members of the Catholic Church which has spread to other religions denominations;¹¹ the absence of conditions for free and fair elections in the country;¹² the arbitrary detention of human rights defenders, journalists, and members of the Catholic Church;¹³ and the government's repressive strategy to silence critical voices to the government ahead of the 2024 regional elections.¹⁴

² IACHR, Press Release No. 145/18, [IACHR Announces Establishment of Interdisciplinary Group of Independent Experts for Nicaragua](#), July 2, 2018; GIEI, [Report on the violent events that took place between April 18 and May 30, 2018](#), December 21, 2018.

³ IACHR, [Annual Report 2018, Chapter IV.B Nicaragua](#); Annual Report 2019, Chapter IV.B Nicaragua, February 24, 2020; Annual Report 2020, Chapter IV.B Nicaragua, February 2021; Annual Report 2021, Chapter IV.B Nicaragua, May 2022; Annual Report 2023, Chapter IV.B Nicaragua, December 31, 2023; Annual Report 2025, Chapter IV.B Nicaragua, March 26, 2025.

⁴ IACHR, Report: Closure of civic space in Nicaragua, OEA/Ser.L/VIII.Doc.212/23, September 23, 2023; [Persons deprived of liberty in Nicaragua in connection with the human rights crisis that began on April 18, 2018](#), OEA/Ser.L/V/II. Doc. 285, October 5, 2020; [Report on Forced Migration of Nicaraguan Persons to Costa Rica](#), OEA/Ser.L/V/II. Doc.150, September 7, 2019; [Report on Gross Human Rights Violations in the Context of Social Protests in Nicaragua](#), OEA/Ser.L/V/II.Doc.86, June 21, 2018.

⁵ IACHR, [IACHR denounces the weakening of the rule of law in the face of serious human rights violations and crimes against humanity in Nicaragua](#), January 10, 2019; [IACHR Condemns Continuing Acts of Repression in Nicaragua during Negotiating Table Talks](#), April 5, 2019.

⁶ IACHR, Press Release No. 80/20, IACHR, [Two Years into Nicaragua's Human Rights Crisis, the IACHR Stresses its Permanent Commitment to Victims and Confirms the Consolidation of a Fifth Phase of Repression](#), April 18, 2020; Press Release No. 152/21, [IACHR Condemns the Serious Escalation of Repression in Nicaragua](#), June 18, 2021.

⁷ IACHR, Press Release No. 93/21, [Three Years After the Start of the Human Rights Crisis in Nicaragua, IACHR Condemns Ongoing Impunity](#), April 19, 2021.

⁸ IACHR, Press Release No. 145/21, [IACHR and OHCHR Categorically Condemn Criminal Prosecution of Presidential Precandidates and Urge State of Nicaragua to Release Them Immediately](#), June 9, 2021; Press Release No. 172/21, [Nicaragua: IACHR and OHCHR Demand an End to Arbitrary Arrests and the Release of All Individuals Detained Since the Start of the Crisis](#) in Nicaragua, July 9, 2021. 238/21, [IACHR and OHCHR Condemn Criminalization, Failure to Enforce Due Process, and Serious Conditions of Detention for Individuals Who are Perceived to Be Government Critics in Nicaragua](#), September 10, 2021; Press Release [RD026/22, REDESCA Condemns the Cancellation of the Membership of 26 Universities and Associations for Academic and Social Purposes by the National Assembly of Nicaragua](#), February 10, 2022.

⁹ IACHR, Press Release No. 021/23, [IACHR Welcomes Release of Political Prisoners in Nicaragua and Rejects Arbitrary Deprivation of Nationality](#), February 13, 2023; Press Release No. 137/25, [IACHR Expresses Concern over New Violations of the Right to Nationality in Nicaragua](#), July 10, 2025

¹⁰ IACHR, Cierre del espacio cívico en Nicaragua, OEA/Ser.L/V/II. Doc. 212/23, September 23, 2023, para. 9.

¹¹ IACHR, Press Release No. 184/22, [IACHR Condemns Acts of Repression and the Arrests of Members of the Catholic Church in Nicaragua](#), August 19, 2022; Annual Report 2024, Chapter IV.B Nicaragua, March 26, 2025, para. 74.

¹² IACHR, Press Release No. 248/22, [IACHR Warns of the Lack of Appropriate Conditions for Holding Free, Fair Municipal Elections in Nicaragua](#), November 4, 2022.

¹³ IACHR, Press Release No. 123/23, [IACHR Rejects Ongoing Repression and Human Rights Violations in Nicaragua](#), June 16, 2023; Press Release No. 184/23, [Nicaragua: IACHR and OHCHR urge the State to release Monsignor Rolando Álvarez and guarantee his human rights](#), August 18, 2023; Press Release No. 218/23, [IACHR Urges the State of Nicaragua to Cease Persecution of the Catholic Church](#), September 15, 2023.

¹⁴ IACHR, Press Release No. 243/23, [IACHR and Its Special Rapporteurship for Freedom of Expression Urge Nicaragua to End Repression Against Indigenous Communities in Its Caribbean Coast](#), October 10, 2023.

6. Considering the above, the Commission has urged the State of Nicaragua, among other aspects, to fulfill its obligations in the field of human rights;¹⁵ implement the recommendations issued by the IACHR;¹⁶ cease acts of persecution against individuals identified as opponents of the government and restoration of democratic guarantees;¹⁷ release individuals who remain arbitrarily detained under inadequate detention conditions;¹⁸ restore and ensure the full enjoyment of civil and political rights;¹⁹ and put an end to the repression and persecution of those seeking the return of democracy in Nicaragua or exercising their public freedoms.²⁰ More recently, on June 11, 2024, the Commission and its Office of the Special Rapporteur for Freedom of Expression (SRFoE, or RELE for its acronym in Spanish) expressed their concern about the serious situation of persons arbitrarily deprived of liberty in Nicaragua and urged that their lives and integrity be guaranteed and that they be released immediately.²¹

7. The Commission noted that on September 5, 2024, 135 individuals considered opponents of the regime who were arbitrarily detained in Nicaragua under deplorable conditions and allegations of torture and ill-treatment were released and transferred to Guatemala. However, it condemned the arbitrary deprivation of their Nicaraguan nationality and the seizure of their assets. On this matter, the IACHR urged Nicaragua to guarantee the right to nationality, to cease repression in the country and to release all people who continue to be arbitrarily detained.²² Seven years having elapsed since the crisis in Nicaragua began, the IACHR condemned the consolidation of the authoritarian regime; expressed its solidarity with the victims and families of the serious human rights violations perpetrated since April 18, 2018; recalled the more than 300 people who lost their lives in the context of state repression; and reaffirmed its commitment to promote and protect human rights in Nicaragua.²³

8. Added to this context is the intensification of repression by the Nicaraguan regime beyond its borders, which affects people in situations of human mobility and opponents of the government.²⁴ In this context, on July 14, 2025, the Commission publicly condemned the murder of retired major Roberto Samcam, which occurred on June 19, 2025, at his residence in San José, Costa Rica, after he was attacked by an individual who, posing as a courier, shot him multiple times.²⁵ Mr. Samcam, who had been living in exile since 2018, was a renowned political analyst and critic of the regime.²⁶ In this context, MESENI has also received information

¹⁵ IACHR, Press Release No. 6/19, [IACHR denounces the weakening of the rule of law in the face of serious human rights violations and crimes against humanity in Nicaragua](#), January 10, 2019; Press Release No. 26/19, [IACHR Condemns Increasing Attacks on the Press and Ongoing Human Rights Violations in Nicaragua](#), February 6, 2019; Press Release No. 90/19, [IACHR Condemns Continuing Acts of Repression in Nicaragua during Negotiating Table Talks](#), April 5, 2019.

¹⁶ IACHR, Press Release No. 113/20, [Two Years After Visit to Nicaragua, IACHR Condemns Lack of Compliance with its Recommendations and Calls on the State to Urgently Implement Them](#), May 16, 2020.

¹⁷ IACHR, Press Release No. 249/20, [IACHR Calls for Persecution of People Identified as Dissidents to End and for Democratic Guarantees to be Reestablished in Nicaragua](#), October 10, 2020.

¹⁸ IACHR, Press Release No. 145/21, [IACHR and OHCHR Categorically Condemn Criminal Prosecution of Presidential Precandidates and Urge State of Nicaragua to Release Them Immediately](#), June 9, 2021; Press Release No. 172/21, [Nicaragua: IACHR and OHCHR Demand an End to Arbitrary Arrests and the Release of All Individuals Detained Since the Start of the Crisis](#) in Nicaragua, July 9, 2021. 197/2022, IACHR and REDESCA: Immediate release of political prisoners in deplorable conditions in Nicaragua is urgently needed, September 5, 2022.

¹⁹ IACHR, Press Release No. 218/22, [In light of serious allegations regarding the closure of civic spaces in Nicaragua, UN and IACHR Special Rapporteurs urge authorities to comply with their international obligations to respect and guarantee fundamental freedoms](#), September 28, 2022.

²⁰ IACHR, Press Release No. 24/2023, [The IACHR and OHCHR condemn the escalation of human rights violations in Nicaragua](#), February 17, 2023.

²¹ IACHR, Press Release No. 132/2024, [Nicaragua: IACHR Urges to Guarantee the Life and Integrity of Persons Arbitrarily Detained and to Immediately Release Them](#), June 11, 2024.

²² IACHR, Press Release No. 217/24, [IACHR condemns arbitrary revocation of nationality of 135 recently released prisoners in Nicaragua](#), September 13, 2024.

²³ IACHR, Press Release No. 73/25, Seven Years After the Start of the Crisis in Nicaragua, IACHR Condemns Consolidation of Authoritarian Regime, April 14, 2025.

²⁴ IACHR, Press Release No. 140/25, [Nicaragua: IACHR condemns transnational repression](#), July 14, 2025.

²⁵ IACHR, Press Release No. 140/25, previously cited.

²⁶ IACHR, Press Release No. 140/2025, previously cited.

about acts of persecution and harassment against Nicaraguan civil society organizations operating in various states, which continue to carry out their work of reporting abuses and supporting victims from exile.²⁷

9. Lastly, the Commission reaffirmed its jurisdiction over Nicaragua and continues to fulfill its monitoring mandates through MESENI, as well as through the analysis and processing of cases, petitions, and precautionary measures.²⁸ In this regard, the Commission emphasized that the State of Nicaragua continues to be bound by all the international instruments to which it is a party, such as the American Convention on Human Rights.²⁹

III. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

10. According to the request, the proposed beneficiaries are members of an evangelical Christian family in the city of Jinotepe, where the proposed beneficiary Rudy Palacios Vargas is pastor of La Roca Church. Rudy and Jessica Palacios Vargas are siblings. Pedro López Calero is the husband of Jessica Palacios Vargas. Armando Bermúdez Mojica is the brother-in-law of the Palacios brothers, and Olga Lara Rojas is Jessica Palacios Vargas's niece by marriage.

11. Olga Lara was a municipal councilor for the Sandinista National Liberation Front (FSLN) in the Jinotepe mayor's office until 2010, when she resigned due to the dismissal of her maternal uncle (Jessica Palacios Vargas's ex-husband) from the position of deputy mayor of Jinotepe. According to the applicant, from that moment on, the family began to be considered "dissidents" of the FSLN. It is noted that Olga Lara, Jessica Palacios, and Rudy Palacios participated in the anti-government protests in Jinotepe in 2018. As part of the state's suppression of these protests, Rudy Palacios was allegedly identified as one of the "leaders" in Jinotepe. This led to death threats being painted on the front of his residence, with words such as "murderer," "bullet," "FSLN," and "wanted." At the same time, police officers reportedly began to monitor La Roca Church.

12. In August 2018, the proposed beneficiary was charged, along with others, with crimes such as organized crime, terrorism, obstruction of public services, and damage to the state. A number of the accused were forced into exile. Two of them were allegedly murdered in exile (one of the cases referred to the records of Roberto Samcam) and others were allegedly victims of attacks in what they describe as "cross-border repression." In this context, Rudy Palacios and Olga Lara also fled Nicaragua in 2018. Following the passage of the Amnesty Law in 2019, the criminal proceedings against the former were dismissed and he was able to return in February 2020. Due to other reasons, Olga Lara returned in May of that same year.

13. They allege that, after returning from exile, Sandinista sympathizers and the police in Jinotepe allegedly started to monitor the family, and they were even subject to detentions that they described as arbitrary. On April 18, 2024, they were reportedly detained and questioned about the whereabouts of the former deputy mayor of Jinotepe and warned not to participate in politics under threat of further detentions. Since then, Rudy Palacios and Olga Lara have received regular police visits: at first these visits were monthly, then every two weeks in 2025, and from April of that year onward the visits take place on a weekly basis, amounting to what they describe as de facto 'house arrest.' In May 2025, the police searched the residence of Jessica Palacios and Pedro López, accusing them of holding political meetings.

²⁷ IACHR, Press Release No. 140/2025, previously cited.

²⁸ IACHR, Press Release No. 312/2021, [IACHR Stresses Its Competent Jurisdiction Concerning Nicaragua and laments Nicaragua's Decision to Denounce the Charter of the OAS in a Context of Serious Human Rights Violations](#), November 20, 2021.

²⁹ IACHR, Press Release No. 312/2021, previously cited.

14. The request states that between 10:00 and 11:00 p.m. on July 17, 2025,³⁰ armed and hooded officers from the Special Police Operations Directorate (DOEP), along with other uniformed and plainclothes police officers, detained the five proposed beneficiaries at their respective residences without presenting arrest warrants. During the operation, agents raided the residences, seized computers and phones, and Pedro López was beaten while being detained. The applicants noted that these detentions took place as part of a coordinated operation in which the Nicaraguan government detained at least eight members of the opposition in the city of Jinotepe.³¹ In the same operation, a family friend and his son were also detained. The father was returned dead to his family by the authorities on August 25, 2025, after 38 days of being missing and without any official information.

15. It is stated that the proposed beneficiaries' detention allegedly constitutes an act of retaliation for belonging to an opposition and critical family. It is also alleged that the repression against those who participated in the 2018 protests has been severe in Jinotepe. In this regard, it is reported that between August 13 and 15, 2025, a new police operation was carried out in Jinotepe. This operation left at least 28 other opposition members missing.³²

16. The day after being detained, the proposed beneficiaries' family and friends reportedly went to the Jinotepe police station to question the grounds for the detentions and request visits, but they were denied access. They then searched the Judicial Assistance Directorate ("el Chipote"), the Third District Police Station in Managua, and the Plaza del Sol police station, but did not find the proposed beneficiaries. Between July 21 and 25, 2025, they continued to visit Chipote and District III, where the authorities simply sent them from one area to another without providing any information on the whereabouts of the detainees.

17. On July 27, 2025, a media outlet reported that the five proposed beneficiaries had been charged with treason and conspiracy to undermine national integrity, and that they were being held in the Granada National Prison System.³³ According to the article, they allegedly participated in a virtual hearing to be notified of the charges. For this reason, on July 28, at 7:00 a.m., family members went to the Granada prison to request information. However, they were told that the proposed beneficiaries were not being held there; and there is therefore no certainty that they have been prosecuted or that they are in that prison, despite what has been published in the press.

18. It is mentioned that in the following weeks, the search continued in prisons in Managua and Granada, but they were unable to find the proposed beneficiaries. The applicants reported that they do not have any information regarding any criminal proceedings against the proposed beneficiaries, given that there is no data on them in the Nicarao System (which systematizes all judicial cases nationwide).

19. Regarding health conditions, the request noted that some of the proposed beneficiaries require medical follow-up: Rudy Palacios Vargas was treated for bladder cancer in 2020 and underwent chemotherapy in previous years; Jessica Palacios Vargas has migraines and hypertension; Olga Lara has a health issue called Legg-Calvé-Perthes and underwent a hysterectomy in 2024; and Armando Bermúdez has diabetes and hypertension.

³⁰ Although the applicants initially indicates that the detention took place on May 17, 2025, in the rest of its submission it states that the event took place on July 17, 2025, a date that coincides with the information provided and published in the media cited by the applicant.

³¹ *Confidential*, [Eight detained by the Police in Jinotepe; relatives still do not know where they are](#), July 21, 2025, (Available only in Spanish).

³² *Confidential*, [28 detainees, including entire families, remain in "enforced disappearance"](#), August 25, 2025 (Available only in Spanish).

³³ *100% Noticias*, [Pastor Rudy Palacios and his family are accused of treason, they are in prison in Granada](#), July 28, 2025 (Available only in Spanish).

20. Lastly, the request states that the proposed beneficiaries are believed to be under enforced disappearance. It was added that no complaint has been filed due to the systematic impunity that allegedly exists in Nicaragua and the lack of independence of the judiciary. The request stated that it is impossible for private attorneys to represent persons deemed “political prisoners” or individuals who are missing. In addition to procedural obstacles such as lack of access to court files, attorneys and relatives expressed fear of reprisals if they go to court or any government institution.

B. Response from the State

21. The Commission requested information from the State on August 29, 2025. To date, no response has been received from them, and the granted timeline has expired.

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

22. 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.

23. 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.³⁴ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.³⁵ 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.³⁶ 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.³⁷ In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

³⁴ 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.

³⁵ 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).

³⁶ 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).

³⁷ 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).

- 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.

24. 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.³⁸ 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.³⁹ 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.⁴⁰

25. The Commission observes that the alleged situation of risk that the proposed beneficiaries face is not an isolated event but, on the contrary, and takes place within the current context that Nicaragua is experiencing, which is particularly hostile towards persons considered, perceived, or identified as opponents of the government and, in general, towards any person critical of the current national government.⁴¹ This context has intensified over time.⁴²

26. Within the framework of the precautionary measures mechanism and in the course of this year, the Commission has identified that the State of Nicaragua has previously detained individuals in factual circumstances similar to those alleged in this matter within the current context taking place in the country. For

³⁸ 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.

³⁹ 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.

⁴⁰ 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).

⁴¹ IACHR, Report: Closure of Civic Space in Nicaragua, OEA/Ser.L/VIII, Doc. 212/23, September 23, 2023, paras. 6, 20, and 62; 2022 Annual Report, Chapter IV.B Nicaragua, paras. 35-65 and 177; Press Release No. 123/23, [IACHR Rejects Continued Repression and Human Rights Violations in Nicaragua](#), June 16, 2023; Press Release No. 184/23, [Nicaragua: IACHR and OHCHR urge the State to release Monsignor Rolando Álvarez and guarantee his human rights](#), August 18, 2023; Press Release No. 218/23, [IACHR Urges the State of Nicaragua to Cease Persecution of the Catholic Church](#), September 15, 2023; Press Release No. 152/21, [IACHR Condemns the Serious Escalation of Repression in Nicaragua](#), June 18, 2021; Press Release No. 2/21, [IACHR Condemns Growing Harassment in Nicaragua](#), January 6, 2021; Annual Report 2023, Chapter IV.B Nicaragua, December 31, 2023, paras. 5, 36, and 138.

⁴² IACHR, Press Release No. 113/20, [Two Years After Visit to Nicaragua, IACHR Condemns Lack of Compliance with its Recommendations and Calls on the State to Urgently Implement Them](#), May 16, 2020; Annual Report 2020, Chapter IV.B Nicaragua, paras. 46-52; 2023 Annual Report, Chapter IV.B Nicaragua, December 31, 2023, para. 19.

example: Aníbal Martín Rivas Reed;⁴³ Douglas Gamaliel Pérez Centeno;⁴⁴ José Alejandro Hurtado Díaz,⁴⁵ and Julio Antonio Quintana Carvajal.⁴⁶

27. Taking into account the above, the Commission will proceed to analyze the procedural requirements regarding the situation that the proposed beneficiaries face in Nicaragua.

28. With regard to the requirement of *seriousness*, the Commission considers that it has been met, taking into account that, according to the applicants, for nearly two months the whereabouts or fate of the proposed beneficiaries has been unknown since police officers detained them at their residences on July 17, 2025. Those close to them are unable to obtain information on the proposed beneficiaries' current location, despite the search efforts and actions taken.

29. In this regard, the Commission has no evidence to prove that the proposed beneficiaries were brought before the competent courts of Nicaragua, nor does it have any details regarding the charges brought against them or the initiation of legal proceedings against them. The only reference available comes from a media outlet, which does not constitute an official source of government information. In this sense, the Commission understands that their friends and family are unable to activate the corresponding resources for their protection, as the competent court for their criminal trial, if it exists, has not been identified.

30. Added to this is the allegation that individuals considered to be "political prisoners" or missing persons do not have legal representation due to the fear of experiencing reprisals if they go to court or any government institution to request their release. This is concerning in light of the current repression in Nicaragua against any questioning or criticism of the government, which would make it impossible to activate internal resources for their protection. In addition, there is no record in the judicial system that allows for the identification of an open proceeding or the action of any competent court. Therefore, it is also impossible to determine whether the proposed beneficiaries receive medical care and the medications necessary to treat their health issues, as the judicial authority responsible for their legal situation is unknown.

31. The Commission observes that, after the proposed beneficiaries were detained, individuals close to them repeatedly visited various prisons in order to obtain information about their whereabouts and current conditions. However, despite the efforts and request, State authorities did not provide official data on their current condition. Therefore, to date, it has not been possible to confirm their whereabouts or obtain an official response about their current state.

32. Having requested information from the State under Article 25 of its Rules of Procedure, the Commission regrets the lack of response to the request. Although the foregoing is not sufficient *per se* to justify granting a precautionary measure, the lack of response from the State prevents the Commission from determining about the measures that are purportedly being implemented to address the situation that places the proposed beneficiary at risk and to dispute the facts alleged by the applicant. Therefore, the Commission does not have information that would allow it to assess whether the situation of risk has been mitigated, nor regarding the actions taken to determine their whereabouts or fate. The Commission also notes that the proposed beneficiaries may be in state custody, in which case the state should have precise information on their current locations and situations.

⁴³ IACHR, [Resolution No. 46/25](#), Precautionary Measures No. 755-25, Aníbal Martín Rivas Reed, regarding Nicaragua, June 24, 2025.

⁴⁴ IACHR, [Resolution No. 33/25](#), Precautionary Measures No. 252-25, Douglas Gamaliel Pérez Centeno regarding Nicaragua, April 6, 2025.

⁴⁵ IACHR, [Resolution No. 26/25](#), Precautionary Measures No. 222-25, José Alejandro Hurtado Díaz regarding Nicaragua, March 14, 2025.

⁴⁶ IACHR, [Resolution No. 16/25](#), Precautionary Measures No. 117-25, Julio Antonio Quintana Carvajal regarding Nicaragua, February 18, 2025.

33. The Commission emphasizes that their close circle has been unable to contact the proposed beneficiaries since they were detained, and have not received any information their legal situation, such as, for example: the existence of an investigation file against them; the procedural status of the investigation; the grounds for their detention; whether the court case was subject to judicial review; their place of detention; the detention conditions; or the possibilities of being able to contact legal representation they trust; among others. Given that it has not been possible to contact the proposed beneficiaries, the situations that place them at risk are allegedly exacerbated by the impossibility of knowing where they are being held and verifying their current status.

34. In view of the foregoing considerations and in light of the *prima facie* standard, the Commission considers that the rights to life and personal integrity of the proposed beneficiaries are at serious risk to the extent that, to date, there has been no official information about their fate or whereabouts, as well as about their current situations.

35. With regard to the requirement of *urgency*, the Commission considers that this is also met, insofar as the passage of time without establishing their whereabouts is likely to cause further harm to the rights to life, personal integrity, and health of the proposed beneficiaries. Additionally, the Commission does not have a response from the State regarding the actions that may be taken to address or mitigate the risk faced by the proposed beneficiaries, nor about any measures to locate their whereabouts.

36. 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. BENEFICIARIES

37. The Commission declares the following as the beneficiaries: (1) Armando José Bermúdez Mojica, (2) Olga María Lara Rojas, (3) Pedro José López Calero, (4) Jessica María Palacios Vargas, and (5) Rudy Antonio Palacios Vargas, who are duly identified in this proceeding.

V. DECISION

38. 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 Nicaragua:

- a) adopt the necessary measures to determine the situation and whereabouts of Armando José Bermúdez Mojica, Olga María Lara Rojas, Pedro José López Calero, Jessica María Palacios Vargas, and Rudy Antonio Palacios Vargas in order to protect their rights to life and personal integrity;
- b) formally indicate whether the beneficiaries have been charged with a crime and/or have been brought before the appropriate judicial authority; and if not, clarify the reason for their detention without charge and judicial supervision;
- c) clarify the circumstances and conditions of their detention, including the place of their detention, and whether they have access to their legal representatives and family, as well as the necessary health care; and
- d) report on the actions taken to investigate the alleged facts that led to the adoption of this resolution, so as to prevent such events from reoccurring.

39. The Commission requests that the State of Nicaragua 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.

40. 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.

41. The Commission instructs its Executive Secretariat to notify this resolution to the State of Nicaragua and the applicant.

42. Approved on September 16, 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