
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 87/2025**

Precautionary Measure No. 388-12

Edgar Ismael Solorio Solís and thirteen other persons regarding Mexico¹

November 27, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of Edgar Ismael Solorio Solís et al., in Mexico. At the time of making the decision, the Commission assessed the actions taken by the State during the implementation and the lack of concrete, current, and specific events against the beneficiaries that allow a situation posing a serious and imminent risk to be identified. Taking into account the nature of precautionary measures and in light of the information available, the Commission considered that it is currently not possible to establish a situation presenting a risk under the terms of Article 25 of the Rules of Procedure. Consequently, the IACHR decided to lift the measures.

II. BACKGROUND INFORMATION

2. On November 6, 2012, the IACHR granted precautionary measures in favor of the three children of Ismael Solorio Urrutia and Manuela Marta Solís, who were leaders of the organization “El Barzón” and were murdered on October 22, 2012. The measures were also extended to members of this organization, which is involved in environmental protection in Chihuahua, Mexico, given that all members had received death threats due to their work. The IACHR requested that Mexico:

- a. adopt the necessary measures to guarantee the life and personal integrity of the members of the organization “El Barzón” and the three children of Ismael Solorio Urrutia and Manuela Marta Solís, all identified in the request for precautionary measures;²
- b. consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and
- c. report on the actions taken to investigate the facts that led to the adoption of precautionary measures.³

3. On February 4, 2013, the IACHR extended the measures in favor of Emilio Rayos Hernández and Sergio Roque Solís Solís, members of the organization “El Barzón.”⁴ The information indicated that the former had been deprived of his liberty, allegedly by police officers, and subjected to torture, while the latter had been receiving death threats.

4. On January 13, 2016, the IACHR extended the precautionary measures in favor of Irving Rodríguez Renova, son of the beneficiary Heraclio Rodríguez. In that regard, the Commission requested that Mexico:

¹ In accordance with Article 17(2)(a) of the IACHR Rules of Procedure, Commissioner José Luis Caballero Ochoa, a Mexican national, did not participate in the debate and deliberation of this matter.

² The list includes (i) Edgar Ismael Solorio Solís, (ii) Erick Solorio Solís, (iii) Uriel Alejandro Solorio Solís, (iv) Joaquín Solorio Urrutia, (v) Felipe Solorio Urrutia, (vi) César Solorio Urrutia, (vii) Heraclio Rodríguez, (viii) Martín Solís Bustamante, (ix) Luis Miguel Rueda Solorio, (x) Ángel Rueda Solís, and (xi) Siria Solís. IACHR, Resolution No. 1/2016, Precautionary Measures No. 388-12, Extension of beneficiaries of the Matter of Edgar Ismael Solorio Solís and others regarding Mexico, January 13, 2016, para. 3.

³ IACHR, *Annual Report 2012*, Chapter III, C. 1. Measures granted by the Commission, para. 42.

⁴ Communication of the IACHR to the Permanent Representative of Mexico to the OAS of February 4, 2013.

- a. adopt the necessary measures to preserve the life and personal integrity of Irving Rodríguez Renova;
- b. consult and agree upon the measures to be adopted with the beneficiary and his representatives; and
- c. report on the actions taken to investigate the alleged facts that led to the adoption and extension of the precautionary measure, so as to prevent them from reoccurring.⁵

5. The Center for Women's Human Rights (*Centro de Derechos Humanos de las Mujeres, CEDHEM*) exerts representation before the Commission.

III. INFORMATION PROVIDED DURING THE TIME THESE PRECAUTIONARY MEASURES WERE IN FORCE

A. Procedure during the time the measures were in force

6. Following the latest extension of the measures, the Commission had followed up on the situation by requesting information from the parties. In this regard, communications were received from the parties and sent from the IACHR on the following dates:

Year	State	Representation	IACHR
2016	March 4	No information	July 19
2017	No information	April 26	September 25
2018	No information	January 16	
2019	June 12	No information	April 8, July 29
2020	No information	June 6	
2022	December 5	December 12	September 29
2023	March 13	December 5	March 1, April 12 December 29
2024	March 27	July 19 (extension), September 23	January 25, February 9 and 14, March 5, May 22, July 22, October 23
2025	January 23, April 11, November 12	March 18, August 25	February 13, March 31, June 3, October 17

7. The Commission held working meetings with the parties on October 21, 2015 and February 29, 2024. In its reports of March 27, 2024, January 23, and April 11, 2025, the State requested that the measures be lifted. These communications were forwarded to the representation, which required that the precautionary measures be kept in force. Below is the information submitted by the parties.

B. Information provided by the State

8. On March 4, 2016, the State reported on investigations opened into acts of violence committed against Irving Rodríguez Renova on December 26, 2015. On June 12, 2019, the State highlighted the following: two consultation meetings were held in March 2019; an investigation into acts of violence involving police officers on April 20, 2017 was opened; protective measures were granted in favor of Heraclio Rodríguez during his time as a candidate. The measures included three security agents and was later reduced to one security agent, provided by the Witness Protection Unit; and proceedings in the investigation into the murders of Ismael Solorio Urrutia and Manuela Martha Solís Contreras, including follow-up meetings between the Chihuahua State Office of the Attorney General (FGEC) and the beneficiaries.

⁵ IACHR, Resolution No. 1/2016, previously cited.

9. On December 5, 2022, the State referred to proceedings in the investigations into the murders of Ismael and Manuela. It was added that Martín Solís Bustamante's security detail had been reinforced with security agents and that there were investigations into the threats against him. They stated that Edgar Ismael Solorio Solís, Eric Solorio Solís, Joaquín Solorio Urrutia, Felipe Solorio Urrutia, Silvia Gil Díaz, Lucero Gil, Nayeli Gil, Cristal Gil, Eraclio Rodríguez Gómez, and Martín Solís Bustamante had security agents from the State Secretariat of Public Security (*Secretaría de Seguridad Pública del Estado, SSPE*). They reported that a working meeting had been held on November 17, 2022, during which they addressed the situation Ismael and Manuela were facing, and agreements were reached.⁶ On March 13, 2023, the State continued to mention steps taken in the investigation into the murders of Ismael and Manuela, in accordance with the agreements reached during the latest internal meeting.

10. On March 27, 2024, the State referred to the enforcement of an arrest warrant in the investigation. In addition, they also listed the implementation meetings between 2021 and 2022 with the beneficiaries, corresponding to March 19, April 20, June 24, July 27, October 15, and December 9, 2021, as well as March 11 (deferred), April 12 (deferred), July 27, and August 3, 2022. They added that internal meetings to follow up on the case of Ismael and Manuela were held on March 17, 22, and 31, April 16, and May 11 and 17, 2021. At its July 2023 meeting, the Public Prosecutor's Office agreed to "manage and strengthen the team conducting the technical analysis of telephone calls" in the investigation, which was completed on August 31, 2023. Subsequent follow-up meetings related to the investigation were suspended by the beneficiaries and their legal representatives, after which the Prosecutor's Office informed them of the channels through which it remained available. The State provided updates on a ruling by the Analysis and Context Unit (*Unidad de Análisis y Contexto*) of the Prosecutor's Office related to the investigation. The appeal for protection of constitutional rights (*amparo*) filed against the pending arrest warrant was denied. Given the possibility that an individual subject to an arrest warrant might have gained access to sensitive information concerning the investigation and the beneficiaries, it became necessary to strengthen the logistics of Joaquín Solorio Urrutia's security detail and reinforce overall security measures.

11. In 2024, the State indicated that it had no record of any situation that placed the beneficiaries at risk, any incident involving beneficiaries or their families, or of any criminal acts committed against them. The foregoing is based on reports from the Protection Unit, which analyzed information provided by beneficiaries, as well as information presented by various agencies of the Office of the Attorney General in early 2024. The applicants detailed the protective measures in place: Edgar Ismael Solorio Solís and Eraclio Rodríguez Gómez each have a security agent; and Erick Solorio Solís, Joaquín Solorio Urrutia, Felipe Solorio Urrutia, and Martín Solís Bustamante have one security agent each and their residences have closed-circuit television, outdoor surveillance cameras, alarm service, door and window opening sensors, motion detection sensors, lights, and floodlights. High-security locks were installed on doors, as well as steel bars, razor wire, and steel protectors at their residences. In addition, Joaquín Solorio was provided a panic button and three satellite phones for the beneficiaries. The State provided additional information regarding the issues raised by the representation, including: the strengthening of protective measures along a road route following events in May 2022; measures taken in response to alleged insufficiencies in travel allowances and fuel in October 2022; clarification that the removal of a private security agent resulted from their arrest in December 2022, with steps taken to remedy the resulting gap; and the replacement, on December 18, 2023, of a vehicle used by the protection team that had presented mechanical problems.

12. The State reported that, in 2021, Joaquín Solorio Urrutia was removed from the area and incorporated into the Protection Mechanism. A risk assessment carried out on January 28, 2022, resulted in a medium risk level, and the shelter that had been granted was therefore withdrawn. At a meeting with

⁶ The following agreements were reached: (i) to request a new risk assessment in favor of beneficiaries by the Mechanism for the Protection of Human Rights Defenders and Journalists (the Mechanism); (ii) to analyze a request for protection in favor of Joaquín Solorio's wife; (iii) to conduct a technical visit to Joaquín Solorio's residence in order to determine infrastructure measures and review the issues concerning the security cameras which have been installed.

representation on October 7, 2021, the State emphasized the importance of reporting any situations that they consider concerning or complex to the protection unit of the Prosecutor's Office. In this regard, after coordinating with the Protection Mechanism, the State Protection Unit developed a protection plan in favor of the beneficiary Joaquín Solorio Urrutia, who agreed to return to the state and rejected federal protection. In March 2022, they issued a request to appoint a protection officer on his behalf, and his return was coordinated, which was carried out with his security agent. The State reported on the security strategy in the entity, emphasizing the authorities' ongoing efforts and the absence of incidents that would place the beneficiaries at risk. It also noted a lack of information provided by the beneficiaries and therefore requested that the measure be lifted.

13. On January 23, 2025, the State indicated that it held a working meeting with the representation on May 27, 2024. They added that efforts to execute the outstanding arrest warrant are ongoing, and noted that the individual remains constantly on the move and operates with several vehicles linked to the criminal organization to which he belongs. They also highlighted operations carried out in 2024. They specified that protective measures in favor of beneficiaries remain in place, reviewed issues related to security agent services, and clarified that vehicle repairs are necessary and that steps are being taken to cover these maintenance periods. The State indicated that it had been informed of a break-in at a house adjacent to Joaquín Solorio's on June 11, 2024. As a result, authorities contacted him on June 20, 2024 to confirm that no complaint had been filed in relation to the incident and to remind him of the importance of filing complaints. They emphasized that no situations of risk have been recorded in the daily reports kept by the security agents of the National Protection Unit, who continue to provide security in favor of Edgar Ismael Solorio Solís, Erick Solorio Solís, Joaquín Solorio Urrutia, his wife, Felipe Solorio Urrutia, Eraclio Rodríguez Gómez, and Martín Solís Bustamante.

14. The State informed that the representation had refused to hold consultation meetings "due to the alleged hierarchical level of the people who would be chairing the meetings." In turn, regarding a request by the representation to hold meetings "on structural issues," the State recognized the work of the beneficiaries as environmental defenders, while highlighting the procedural requirements for precautionary measures and the matters they address. In this regard, they questioned whether the beneficiaries' aim is to conduct investigations against individuals for alleged irregularities in water use. They additionally noted, as an ongoing challenge, that the representation has declined to cooperate in the administrative procedures required for the implementation of the protection services. The State added that the incidents presented by the representation are being handled by local protection authorities and are unrelated to the facts, nor are any complaints being filed.

15. On April 11, 2025, the State announced that, on April 15, 2024, it offered to hold a follow-up meeting in May 2024 with the head of the Coordination for the Attention of Cases in International Human Rights Organizations (*Coordinación para la Atención de Casos en Organismos Internacionales de Derechos Humanos*, CACOIDH) of the Ministry of the Interior (SEGOB) and the team responsible for precautionary measures, but the representation did not respond. It added that the representation rejected this offer because they believed it would lower the standard of care that had been provided over time. On March 25, 2025, CACOIDH requested that the representation propose two dates in April 2025 for an in-person or virtual meeting, which would be chaired by the body's coordinator and would convene the authorities responsible for implementation. However, the representation did not issue a response. The State stated that this position does not allow for a date to be set for follow-up meetings. It was stated that there is no evidence of an ongoing situation of risk against the beneficiaries.

16. On November 12, 2025, the State reported on proceedings by the National Office of the Attorney General (*Fiscalía General de Justicia del Estado de México*, FGJEC) in October 2025 related to the pursuit of justice: actions to search for and locate a witness with the initials M.C.V.; preparation of a file on the aforementioned witness; updating of information by the Analysis and Context Unit. In addition, the FGJEC provided details on actions taken to execute the outstanding arrest warrant, compiling data on the behavior

and movements of the wanted person, as well as addresses, places frequented, and relationships with illegal groups. The FGJEC requested the army's cooperation in executing the order. The State again detailed the security arrangements for each beneficiary (as noted above), adding information on the security agent assigned to each person and their respective residence. The State reiterated that there are no records of incidents that may have placed the beneficiaries at risk and noted that the FGEC and SEGOB communication channels remain available to them.

C. Information provided by the representation

17. On April 26, 2017, the representation reported that on April 20, 2017, police officers beat beneficiaries César Solorio Urrutia and Emilio Rayo. This allegedly led to an exchange of blows with a group of members of "El Barzón" who intervened. On January 16, 2018, it was reported that beneficiary Heraclio Rodríguez was running for Congress and noticed that officials from the Ministry of the Interior and police officers were following him. In December 2017, public security authorities conducted a reliability check on Heraclio Rodríguez's security agent, who was subsequently removed from his post.

18. On June 8, 2020, the representation referenced the electrification of illegal wells in the *Ejido* [communal land used for agriculture] called Constitución. They added that on April 19, there was a confrontation between organized crime and the National Guard at the site where they were seeking to install electricity, and that a local family publicly attributed the events to members of "El Barzón." They reported that, on April 29, 2020, a vehicle belonging to Heraclio Rodríguez was burned. On May 24, 2020, the press reported on the prosecutor's search for individuals linked to the murders of Ismael and Manuela. On May 27, 2020, a person close to the beneficiaries noticed that they were being followed, so they confronted the individual, who replied that they were looking for "Gabino, Felipe, Martín, and Joaquín" in connection with support for the community. When told that they refused to provide any information, this individual reportedly replied that they should be careful about hanging out with people from "El Barzón" as they would "get what's coming to them" as well. On May 28, the representation requested protection in favor of Joaquín Solorio Urrutia's wife, due to his high profile in defending the *Ejido* Constitución. On June 5, 2020, Martín Solís Bustamante received a threatening message on his cell phone;⁷ he filed a complaint and requested that security measures be reinforced. The representation requested the extension of the measures in favor of the beneficiaries' families, as well as the request for interim measures.

19. On December 12, 2022, the representation announced that, on August 29, 2021, Joaquín Solorio was the victim of a safety incident (no further details). They reported that, in May 2022, judicial authorities issued arrest warrants for 7 of the 13 beneficiaries. They added that in 2020 there were two consultation meetings and that, during this work meeting, they were able to update the information regarding the situation that places them at risk.

20. On December 5, 2023, the representation noted that ten years after the events, the arrest warrant against a person linked to the murders of Ismael and Manuela had still not been executed. They confirmed the implementation of the protection measures reported by the State, but noted that, despite their requests, they had not been able to secure protection in favor of Joaquín Solorio's wife which prompted them to file an internal appeal for that purpose. In addition, they stated that Joaquín Solorio's security agent was not provided with sufficient resources for fuel and travel expenses and, on occasions, shared the protection element with Erick Solorio Solís and Edgar Ismael Solorio Solís. They added that the beneficiaries continued to report violations and defend environmental rights, especially in the *Ejidos* Benito Juárez and Constitución, reporting various advocacy actions related to a water conflict in Chihuahua. They reported that a family in the

⁷ The message reads: "You better stop fucking around we know you're organizing blockades another stupid move that will attract the guards to the area and we'll kill you and your family Remember Solorio and his bitch wife along with your shitty followers i'm watching you and next time i will kill you you are attracting too much attention to the area if you don't understand I'll come visit you i'm here you bastard you son of a bitch to cut your balls off in front of your wife I don't want any more problems in Buena Flores or the surrounding area."

area was seeking to electrify illegal water extraction wells. In addition, they warned that they were aware of complaints and arrest warrants against beneficiaries for crimes of property damage, which they allege is retaliation for their defense of water. They clarified that no beneficiary was deprived of their liberty. The representation reported that the beneficiary, Joaquín Solorio, had to relocate to a shelter from September 2021 to February 2022 due to a safety incident that occurred on August 29, 2021.⁸ They warned that Joaquín Solorio was incorporated into the Mechanism to facilitate his extraction and, on January 28, 2022, he underwent a risk assessment. This assessment yielded a medium risk rating, due to the absence of direct risk events against him, resulting in his removal from the shelter. They expressed disagreement with the outcome of the risk assessments and stated that he had the protection of a security agent.

21. On September 23, 2024, the representation alleged non-compliance with the agreements from the meetings held with the State, and warned that the source of risk for the beneficiaries was not mitigated. In this regard, they specified that the arrest warrant against one individual had still not been executed, more than a year and a half after the last attempt to enforce it. They alleged that there were shortcomings in the implementation of the protection detail, such as the constant need for vehicle repairs, the lack of personnel to provide protection, and the need to file an appeal for protection of constitutional rights (*amparo*) to protect Joaquín Solorio's family. For its part, the representation acknowledged that infrastructure measures are being maintained and that the quality of the equipment could be improved. They reported that in May 2023, while Erick Solorio was on his way to cash checks at a bank in a municipality of the entity, he and his security agent were approached by individuals allegedly linked to organized crime, who questioned him and told him to "get the hell out of there." In addition, on June 11, 2024, an individual informed Joaquín Solorio that an individual had been seen entering the residence of beneficiary Uriel Solorio Solís, which was unoccupied due to his passing and is located adjacent to Joaquín Solorio's residence. The individual who broke in was later approached by witnesses to the incident, who were able to retrieve the computer that he had taken from the premises, and the individual left the scene. The representation requested that the measures remain in force, stating that impunity prevails for the murders of Ismael Solorio and Manuela Solís, as the outstanding arrest warrant has still not been executed; and that the structural causes that gave rise to the risk, such as the environmental causes that the organization is pursuing, had not been addressed.

22. On March 18, 2025, the representation reported various issues concerning the implementation of protection measures, including an insufficient number of security agents to meet the beneficiaries' needs; the absence of replacements when personnel are unavailable; the rotation of security agents among beneficiaries, which creates instability; vehicles with frequent mechanical failures; and insufficient travel allowances and fuel. In response to the State's refusal to hold meetings with the responsible authorities, they argued that "the requirement that these meetings be chaired by high-level authorities is not a matter of obstruction, but a necessary measure to ensure that the agreements adopted are binding and operational." In addition, regarding the failure to file complaints, they argued that this does not exempt the State from its obligation to act *ex officio* in the face of "reasonable indications of a risk to life and integrity." The representation reiterated that the State has the obligation to address the "causes that generate risk". In this regard, they highlighted as a new component of "risk and threat" that there are "credible indications" that a company was exploring the reactivation of a mining project in the region. Therefore, the risk is related to the defense of the territory and natural resources and opposition to mining activity. For the representation, the foregoing means "potential direct aggressions".

23. On August 25, 2025, various arguments were summarized: on access to justice and the execution of the arrest warrant; and on deficiencies in the implementation of protection. In turn, it was emphasized that they decided not to respond to the State's invitations to meetings because these were not "led by authorities with sufficient decision-making power." Concern was expressed about the possible resumption

⁸ The incident was not reported directly and, according to details contained in other attached documents, refers to an event that occurred against another individual, but of which he was made aware that he was the target. The available information highlights that there are no complaints or reports of the facts.

of mining activity, an issue that “should be discussed within the framework of precautionary measures.” Lastly, the representation reported that “the beneficiaries currently have a structured security plan in place, which has had a deterrent effect on potential aggressors with whom they coexist in the community” and that “it has made it possible to build an environment of permeable security.” They are concerned that they may withdraw this security detail.

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

24. The precautionary measures mechanism is part of the Commission’s functions of overseeing compliance with the human rights obligations established 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; while the mechanism of precautionary measures is set forth in Article 25 of the Commission’s Rules of Procedure. In accordance with this Article, the IACHR grants precautionary measures in urgent and serious situations in which these measures are necessary to avoid irreparable harm to persons or to the subject matter of a petition or case before the organs of the inter-American system.

25. 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.⁹ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.¹⁰ 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.¹¹ Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under study by the organs of the inter-American system. 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 of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations. In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

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

⁹ 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.

¹⁰ 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).

¹¹ 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).

26. In this sense, Article 25(7) of the Commission's Rules of Procedure establishes that decisions granting, extending, modifying or lifting precautionary measures shall be adopted through reasoned resolutions. Article 25(9) sets forth that the Commission shall evaluate periodically, at its own initiative or at the request of either party, whether to maintain, modify or lift the precautionary measures in force. In this regard, the Commission shall assess whether the serious and urgent situation and the risk of irreparable harm that caused the adoption of the precautionary measures persist. Furthermore, it shall consider whether there are new situations that may meet the requirements outlined in Article 25 of its Rules of Procedure.

27. Similarly, the Commission recalls that while the assessment of the procedural requirements when adopting precautionary measures is carried out from a *prima facie* standard of review, keeping such measures in force requires a more rigorous evaluation.¹² In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.¹³ The Inter-American Court has indicated that the passage of a reasonable period of time without any threats or intimidation, added to the lack of imminent risk, may lead to the lifting of international protection measures.¹⁴

28. Similarly, the Commission reiterates 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.¹⁵ This is better suited to be carried out by the Petition and Case system. In relation to the above, the Commission emphasizes that, within the framework of the precautionary measures mechanism, it is not appropriate to review internal investigations or legal proceedings or to address structural or general issues regarding the State's compliance with its human rights obligations. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be resolved without making any determination on the merits.¹⁶

29. In analyzing the validity of the procedural requirements, the Commission emphasizes that the purpose of this proceeding refers to the protection of the life and integrity of: (1) Edgar Ismael Solorio Solís, (2) Erick Solorio Solís, (3) Uriel Alejandro Solorio Solís, (4) Joaquín Solorio Urrutia, (5) Felipe Solorio Urrutia, (6) César Solorio Urrutia, (7) Heraclio Rodríguez, (8) Martín Solís Bustamante, (9) Luis Miguel Rueda Solorio, (10) Ángel Rueda Solís, (11) Siria Solís, (12) Emilio Rayos Hernández and (13) Sergio Roque Solís Solís, and (14) Irving Rodríguez Renova. The foregoing, through the adoption of concerted measures and the investigation of the facts that gave rise to the precautionary measures.¹⁷ Based on the information provided in the case file, the Commission acknowledges the following:

a. Regarding the protection measures

30. It should be noted that, although the representation mentioned challenges, various protection measures have been implemented: (a) Beneficiaries were provided with security agents, and this measure has been reviewed and reinforced in situations that placed them at risk, for example: in favor of Heraclio Rodríguez

¹² Inter-American Court of Human Rights (I/A Court H.R.), Case of Fernandez Ortega et al., Provisional Measures regarding Mexico, Order of February 7, 2017, considerandums 16 and 17 (Available only in Spanish).

¹³ I/A Court H.R., Case of Fernandez Ortega et al., previously cited, considerandums 16 and 17 (Available only in Spanish).

¹⁴ I/A Court H.R., Case of Fernandez Ortega et al., previously cited, considerandums 16 and 17 (Available only in Spanish).

¹⁵ 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.

¹⁶ 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).

¹⁷ IACHR, Resolution 23/2015, previously cited.

when he requested it; in response to threats against Martín Solís Bustamante; or with regard to Joaquín Solorio in response to the possibility that an individual had accessed personal information. In particular, according to information received up to November 2025, Edgar Ismael Solorio Solís and Eraclio Rodríguez Gómez each have a security agent in their favor, as do Erick Solorio Solís, Joaquín Solorio Urrutia, Felipe Solorio Urrutia, and Martín Solís Bustamante. (b) Infrastructure measures have been provided at their residences, consisting of closed-circuit television, cameras, alarm service, door and window sensors and motion detectors, lights and reflectors, door locks, steel bars, razor wire, and steel protectors. (c) A panic button in favor of Joaquín Solorio. (d) Three satellite phones. (e) The State has also provided protection through security agents to non-beneficiaries, such as the members of “El Barzón” or Joaquín Solorio’s wife. (f) After a possible situation that may have put Joaquín Solorio Urrutia at risk was reported in 2021, the Protection Mechanism proceeded to relocate him and provide him with shelter in another location, which was only withdrawn once a risk assessment had been carried out and a protection plan had been prepared and accepted by the beneficiary.

31. The IACHR recognizes the importance of the protection measures provided and reviewed for the protection of the beneficiaries; which, without prejudice to opportunities for improvement, have been corroborated by the representation and their deterrent effect on potential aggressors has been recognized.

b. Concertation measures

32. Meetings were held on June 12, 2019, March 17, 19, 22, and 31, April 16 and 20, May 11 and 17, June 24, July 27, October 7 and 15, and December 9, 2021, July 27 and August 3, 2022, August 31, 2023, and the last one registered was on May 27, 2024. The IACHR highlights the importance of the meetings held throughout these years, which have served as a bridge for advancing key aspects of the investigation into the murders of Ismael Solorio and Manuela Solís, as well as helped address potential shortcomings in the implementation of protection measures. This has enabled dialogue between the parties to address issues related to security agents, vehicles, and infrastructure maintenance. In addition, the Commission positively recognizes the State’s willingness to continue with concerted actions, thereby continuing to call joint meetings.

33. Both parties have confirmed that, after the latest date, although the State has called meetings, the representation has refused to participate on the grounds that they do not recognize the authority of the SEGOB personnel responsible for coordinating the implementation of precautionary measures recommended by international human rights organizations. They consider that they are not led by authorities with sufficient decision-making power. In this regard, the Commission recalls that:

it is understandable for some dialogue spaces to include individuals who do not have decision-making power due to various reasons. This case may be presented with representatives of the State as well as with persons representing the beneficiaries. Should this be the case, it is imperative that the proposed action or implementation measure be assessed by the parties and that a timely response be provided, as well as a mechanism for monitoring the agreements. The Commission also notes that it may be necessary for beneficiaries to have prior or subsequent deliberation spaces.¹⁸

34. The Commission reiterates the importance of the cooperation of beneficiaries in the implementation of the measures and recalls that “only through stable, respectful, and constructive dialogue will the beneficiary and authorities be able to overcome the challenges that arise throughout the lifespan of the measures.”¹⁹ In the same vein, the IACHR recalls that “the beneficiaries and their representatives are nonetheless required to provide all necessary collaborative efforts in order to bring about effective

¹⁸ IACHR, Resolution No. 53/2024, Precautionary Measures No. 395-18; Authorities and members of the Gonzaya (Buenavista) and Po Piyuya (Santa Cruz de Piñuña Blanco) Resguardos of the Siona People (ZioBain) regarding Colombia, Follow-up and Expansion, August 21, 2024, para. 54.

¹⁹ IACHR, Towards Effective Integral Protection Policies for Human Rights Defenders, OEA/Ser.L/V/II., Doc. 207/17, December 29, 2017, para. 282.

implementation” of the precautionary measures²⁰ and emphasizes that, in order for the precautionary measures to achieve their objective, the participation of both parties in the implementation process is required.²¹

c. Investigation of the events that gave rise to the precautionary measures

35. Updates have been provided regarding the murder of Ismael Solorio and Manuela Solís on October 22, 2012, and the arrest warrant for one individual remains pending. The State’s efforts in this regard have been updated through October 2025. The State has discussed these issues with the beneficiaries and their representation, who have participated in this process. For its part, the Commission acknowledges that investigations have been opened into acts of violence against some beneficiaries. The IACHR acknowledges the progress reported by the parties with regard to the investigations and recalls the importance of continuing them with due diligence in order to contribute to the mitigation of potential situations that place them at risk.

d. Ongoing risk

36. The Commission recalls that, although the facts must not be sufficiently proven, in order to assess the procedural requirements, it is necessary to provide a minimum of detail of the reported risk. The IACHR notes the following considerations:

- i. The most recent specific and direct incident reported consists of threats received by Martín Solís Bustamante on June 5, 2020, which took place more than five years ago.
- ii. Regarding the displacement of Joaquín Solorio in 2021, the information provided indicates that the event was directed to another individual and no details of the scope of it regarding the beneficiary were provided. In addition to the foregoing, it is observed that the protection measures were effective, with coordination between federal and state authorities to facilitate his removal from the area and, following a risk assessment, ensure his safe return with a protection plan which was approved by the beneficiary.
- iii. With regard to the June 2024 break-in, it occurred at the residence of a beneficiary who had died. Although this residence was adjacent to that of Joaquín Solorio, there is no information indicating that he or any other beneficiary was placed at risk, nor that the incident was targeted rather than isolated. The lack of reports also means that no details are available.
- iv. No information has been provided regarding incidents or events involving any other beneficiaries, nor have any complaints been filed regarding events in general.

37. In this regard, based on the information available, the IACHR notes that in most of the recent events, there are no details of the situations, in addition to the absence of formal complaints that would allow the authorities to clarify the scope of these events and mitigate potential sources of risk. The Commission observes the passage of time, highlighting the passage of 13 years since the measures have been in force, and the facts that motivated these measures.

38. In addition to the previous analysis, the Commission pays special attention to the work carried out by beneficiaries as defenders of environmental and land rights, highlighting the importance of their protection. In this regard, the Commission notes the argument presented by the representation regarding the possible resumption of mining activity in the region where they carry out their work, which could result in

²⁰ IACHR, Second Report on the Situation of Human Rights Defenders in the Americas, OEA/Ser.L/V/II., Doc. 66, December 31, 2011, para. 439; I/A Court H.R., Mapiripán Massacre Case regarding Colombia, Provisional Measures, Order of September 2, 2010, considering 20.

²¹ IACHR Resolution to Lift 41/2025, Precautionary Measure No. 251-15, “Alejandro” and his family unit regarding Mexico, May 11, 2025, para. 32.c.iv.

situations that place them at risk. The Commission emphasizes that it is possible to go before domestic authorities to file formal complaints and request protection in the event of the “potential direct attacks” that the representation mentions. Furthermore, they also have the possibility of submitting a new request for precautionary measures in the terms of Article 25 of the Rules of Procedure.

39. In evaluating compliance with the procedural requirements, considering the assessment that was carried out, the Commission finds that the factual situation has changed. In particular, it has not identified any situation of current risk, while recognizing the implementation of the protection measures by the competent authorities during the time these measures were in force. In assessing the current risk the beneficiaries face, the IACHR takes into account the willingness expressed in the latest briefs from the representation regarding meetings with authorities and the recognition of the effectiveness of the protection measures provided. It therefore trusts in the cooperation of the beneficiaries and the authorities for the proper analysis of the protection needs that remain for each individual, highlighting their work as human rights defenders. In this regard, the IACHR acknowledges the efforts made by the Mexican authorities to comply with this precautionary measure and emphasizes the importance of continuing protection at the domestic level. Moreover, it reminds the State of the importance of domestic authorities conducting a risk assessment, with the participation and collaboration of the beneficiaries, before deciding on the continuation of protection measures.²²

40. Considering the nature of the precautionary measures mechanism, based on the information available, and the analysis carried out, the Commission understands that, to date, that it has no elements to support compliance with the requirements of Article 25 of its Rules of Procedure. In view of the above, and taking into account the exceptional and temporary nature of precautionary measures,²³ the Commission deems it appropriate to lift these measures.

41. The Commission emphasizes that regardless of the lifting of these measures, in accordance with Article 1(1) of the American Convention, it is the obligation of the State of Mexico to respect and guarantee the rights recognized therein.

V. DECISION

42. The Commission decides to lift the precautionary measures granted in favor of (1) Edgar Ismael Solorio Solís, (2) Erick Solorio Solís, (3) Uriel Alejandro Solorio Solís, (4) Joaquín Solorio Urrutia, (5) Felipe Solorio Urrutia, (6) César Solorio Urrutia, (7) Heraclio Rodríguez, (8) Martín Solís Bustamante, (9) Luis Miguel Rueda Solorio, (10) Ángel Rueda Solís, (11) Siria Solís, (12) Emilio Rayos Hernández and (13) Sergio Roque Solís Solís, in Mexico.

43. The Commission recalls that the lifting of these measures does not prevent the representation from filing a new request for precautionary measures, should they consider that there exists a situation presenting a risk that meets the requirements set forth in Article 25 of the Rules of Procedure.

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

²² IACHR [Resolution 9/24](#), Precautionary Measure No. 519-17, Eduardo Valencia Castellanos regarding Mexico, March 6, 2024, para. 35; [Resolution 20/2024](#), Precautionary Measure No. 887-19, Families of the Nueva Austria del Sira Community regarding Peru, April 10, 2024, para. 36; [Second report on the Situation of Human Rights Defenders in the Americas, December 31, 2011](#), OEA/Ser.L/V/II. Doc. 66, paras. 529, 531.

²³ I/A Court H.R., [Matter of Adrián Meléndez Quijano et al.](#), Provisional Measures regarding El Salvador, Order of August 21, 2013, para. 22; [Matter of Galdámez Álvarez et al.](#), Provisional Measures regarding Honduras, Order of November 23, 2016, para. 24 (Available only in Spanish).

45. Approved on November 27, 2025, by Andrea Pochak, First Vice-President; Edgar Stuardo Ralón Orellana, Second Vice-President; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Luiz Marcelo Azevedo
Senior Officer
By authorization of the Executive Secretary