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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUCIÓN 92/2025**

Precautionary Measure No. 1514-25

Ana Amelí García Gámez regarding Mexico<sup>1</sup>

December 12, 2025

Original: Spanish

## **I. INTRODUCTION**

1. On October 14, 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 Emmanuel Ricardo García Huidobro and Claudia Vanessa Gámez Franco ("the requesting party" or "the applicants"), urging the Commission to request that the State of Mexico ("the State" or "Mexico") adopt the necessary measures to protect the rights to life, personal integrity, and health of Ana Amelí García Gámez ("the proposed beneficiary"). According to the request, the proposed beneficiary has been missing since July 12, 2025, and her whereabouts are not known to date.

2. In accordance with Article 25(5) of the Rules of Procedure, the IACHR requested information from the State on October 27, 2025. On November 5 and 27, 2025, the State submitted its observations. For its part, the applicants submitted additional information on October 21, November 29, and December 4, 2025.

3. Upon analyzing the submissions of fact and law furnished by the parties, the Commission considers that the proposed beneficiary is in a serious and urgent situation, given that her current location is unknown to date. Consequently, based on Article 25 of its Rules of Procedure, the IACHR requests that Mexico: a) redouble its efforts to determine the situation and whereabouts of Ana Amelí García Gámez, in order to protect her rights to life and personal integrity; b) ensure that the comprehensive search plan considers differentiated measures due to gender, and respond to the recommendations issued by the UN Committee on Enforced Disappearances and the questions raised by the family; and, as appropriate, provide the relatives with an explanation for their inclusion or dismissal in the actions to be implemented; c) continue to promote smooth and periodic channels of communication with relatives and their representatives on the progress made with respect to the comprehensive search plan and on the open lines of investigation, indicating the reasons for the inclusion or dismissal of the hypothesis of possible state participation in the events reported, and provide information on new proceedings; and d) update on the actions taken to investigate the alleged events that led to the adoption of this resolution, so as to prevent such events from reoccurring.

## **II. SUMMARY OF FACTS AND ARGUMENTS**

### **A. Information provided by the requesting party**

4. According to the request, on July 12, 2025, the proposed beneficiary, 20 years old, left her residence with her father on her way to the 'Auditorio' subway station. She was going to meet with friends for a walk in the Cumbres del Ajusco National Park, located in the Tlalpan borough, in Mexico City (CDMX). At 10:52 a.m., her father sent her a WhatsApp message. At 1:21 p.m., the proposed beneficiary responded: "I didn't end up going with my friends, but I joined a group." At 2:30 p.m., she sent her relatives a photograph where she appeared at the location known as Cruz del Marqués. The applicants referred to statements allegedly provided

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

by witnesses who interacted with the proposed beneficiary on her journey.<sup>2</sup> Since then, her relatives have not been able to contact the proposed beneficiary, and their calls and messages have gone unanswered. The applicants labeled the situation as an “enforced disappearance.” That same July 12, 2025, her relatives reported the disappearance of the proposed beneficiary to the 911 Citizen Service. On that day, two officers from the Secretariat of Security and Citizen Protection of the Tlalpan Mayor’s Office, one identified as “Antonio”, prevented the initiation of the immediate search for the proposed beneficiary and ordered her family and friends to leave the area. These officers reportedly stated that there was a mandatory entry and exit log. The following day, July 13, 2025, family members reported the disappearance to the Office of the Attorney General of Mexico City.<sup>3</sup> After family members left the site, rescue personnel from the Secretariat of Security and Citizen Protection urgently called them to inform them that the order to leave was false and that they could return to participate in the search for the proposed beneficiary. Relatives then requested that the authorities in charge of the search to identify, interview, and investigate the Tlalpan mayor’s office officials who had ordered them to leave the scene.<sup>4</sup> The applicants add that, to date, no measures have been taken to investigate a possible link between the obstruction of the search and the circumstances surrounding the disappearance.

5. The applicants referred to a context of systematic “enforced disappearance” in the Ajusco area. They further explained that there have been more than 100 disappearances in the area since 2010, as well as ongoing discoveries of human remains. Criminal groups such as Los Rojos, Familia Michoacana, Guerreros Unidos, and Tren de Aragua, among others, are believed to operate in the area. These groups are reportedly involved in femicide, human trafficking, and violence against women. According to the latest information provided by the applicants, the Special Prosecutor’s Office for the Investigation and Prosecution of Crimes Related to Enforced Disappearance and Disappearance Committed by Private Individuals and the Search for Missing Persons (*Fiscalía Especializada para la Investigación y Persecución de los Delitos en Materia de Desaparición Forzada y la Desaparición Cometida por Particulares y Búsqueda de Personas Desaparecida*, FIPEDE) reportedly released a list of criminal groups and cartels that have been operating in the area since 2006 to date.<sup>5</sup>

6. In this context, the applicants alleged that on July 15, 2025, fifteen individuals armed with high-caliber weapons and traveling in black trucks with tinted windows were present in the Tezontle Valley during the search operation for the proposed beneficiary. On July 16, 2025, an unlicensed truck with tinted windows arrived during the search. Between July 15 and 16, the proposed beneficiary’s father was allegedly threatened by armed commandos while conducting information-gathering activities with agents from the Investigative Police (*Policía de Investigación*, PDI). Agents of the Public Prosecutor’s Office reportedly refused to record the incidents of July 15 and 16, saying that they would “consult with investigative police officers.” They also indicated that the incidents had not been recorded or investigated as possible obstructions to the search efforts.

<sup>2</sup> A witness reported that they had driven the proposed beneficiary in his vehicle to “El Valle de la Cantimplora,” from where she reportedly began her ascent. Another witness stated that they spoke with her around 4:00 p.m. on the same day. A group of female hikers reported that they encountered the proposed beneficiary during their ascent to Pico del Águila; and that, as they began their descent, she told them she would stay at the site for a few more minutes. Since then, her relatives have not received any more information regarding her whereabouts.

<sup>3</sup> According to the report of the Committee against Enforced Disappearance (UN), attached to the request, the following actions were carried out based on this complaint: i) Registration of the investigation folder by the Special Prosecutor’s Office for the Investigation and Prosecution of Crimes in the Field of Enforced Disappearance of Persons and Disappearance Committed by Individuals and Search for Disappeared Persons on the alleged disappearance; ii) Actions aimed at identifying some witnesses and taking their initial statements and; iii) Five inter-institutional working meetings (July 16 and 21, 2025; August 1 and 22, 2025, and September 11, 2025) in which the relatives and representatives of Ana Amelí García Gámez, as well as agents of the Office of the Attorney General of Mexico City, the Secretariat of Citizen Security of Mexico City, the Commission for the Search for Persons of Mexico City and the National Search Commission participated.

<sup>4</sup> According to the attached official letter CED-UA MEX (768) APP/JAM/PD 2133/2025 of the Secretariat of the Committee on Enforced Disappearances (United Nations Office for Human Rights) addressed to the Permanent Mission of Mexico to the United Nations Office at Geneva.

<sup>5</sup> As indicated by the applicants, on July 16, 2025, the analysis of the criminal context of the area was reportedly requested. In response, on September 11, FIPEDE provided the corresponding information.

7. The request stated that there is an alleged unjustified delay and refusal by the Prosecutor's Office to provide a complete copy of the investigation file, requested on September 17, 2025. They are reportedly only allowed a partial, supervised "review," and are not permitted to obtain copies of key documents. In the applicants' opinion, there is critical information that has not been included in the case file, such as the incidents of July 15 and 16, 2025, the information of the Tlalpan officials who forced them to leave the area, and critical telephone records.

8. On August 2, 2025, the family members sent the prosecutor the name and cell phone number of the police officer in question via WhatsApp so that the corresponding investigations could be initiated. In addition, they requested that the Secretariat of Citizen Security (*Secretaría de Seguridad Ciudadana*, SSC) verify his real name. On August 4, 2025, they expanded the statement in the file and added that a police officer from the Secretariat of Citizen Security of the Tlalpan mayor's office had prevented the immediate search for the proposed beneficiary. On September 4, 2025,<sup>6</sup> the proposed beneficiary's mother requested that the investigation be extended to the police officer of the Tlalpan mayor's office and the Prosecutor's Office of Mexico City, since they had not requested her statement nor had they issued any official communication to the "SSCCCMX", the IACtHR clarifies that it has not been specified which entity this acronym refers to. Her mother also requested that experts in psychology conduct interviews with the individuals who were with the proposed beneficiary at the time of her disappearance.

9. On September 5, 2025, a complaint was filed against the prosecutor before the internal control body of the Office of the Attorney General of Mexico City for failure to comply with guiding principles.<sup>7</sup> On September 8, 2025, they petitioned the Office of the Attorney General to request the intervention of specialized experts. On September 9, 2025, a complaint was filed with the Mexico City Human Rights Commission requesting its intervention due to the lack of substantive progress in the search and investigation processes related to the disappearance. On September 15, 2025, her relatives requested Urgent Action before the Committee on Enforced Disappearances (UN).<sup>8</sup>

10. The applicants added that, on September 22, 2025, the United Nations Committee on Enforced Disappearances issued Urgent Action No. 2133/2025 to immediately search for and locate the proposed beneficiary and requested 13 specific recommendations from the State.<sup>9</sup> According to the attached documentation, the Committee expressed concern that the authorities responsible for the case of Ana Amelí García Gámez had not established a comprehensive strategy and concrete action plan to search for her and to progress the investigation into her alleged disappearance. According to the information available, these authorities have allegedly not taken the following measures, which could be relevant to the search and investigation processes related to the case: (i) conducting a context analysis and ensuring its incorporation, without delay, into the comprehensive search strategy; (ii) conducting an exhaustive search in the area where the disappearance occurred, as well as in other areas that could be relevant to the search and investigation processes related to her case; (iii) immediately identifying, locating, and interviewing the following individuals in order to gather information that could shed light on the fate and whereabouts of Ana Amelí García Gámez;<sup>10</sup> (iv) studying the data, call records, locations, and multimedia content received and generated from cell

<sup>6</sup> According to a complaint filed with the Human Rights Commission on September 9, 2025, attached to the request.

<sup>7</sup> According to the attached complaint, her relatives pointed out the existence of omissions in the search and investigation processes, if any, by the aforementioned authority.

<sup>8</sup> Letter attached to the request.

<sup>9</sup> According to the attached document, in application of Article 30 of the Convention, the Committee requires urgent action by the State party to immediately search for and locate Ms. Ana Amelí García Gámez, and to protect her life and personal integrity, in accordance with its obligations under the Convention. In this regard, the Committee submits to the State a series of recommendations and requests for specific information aimed at strengthening search and investigation efforts and the participation of relatives and representatives in these processes.

<sup>10</sup> This refers to the following: the two officers from the Secretariat of Security and Citizen Protection of the Tlalpan mayor's office who attended to Ms. García Gámez's relatives on the night of July 12, 2025, in front of the National Guard's Citizen Inspection Post; the two investigative police officers who were present on July 16, 2025, when a truck with tinted windows arrived abruptly during a search operation, and who informed the relatives about criminal operations in the area where the disappearance occurred; the witnesses to the events; all other persons who may have information relevant to the case.

phones;<sup>11</sup> (v) collecting, securing, and analyzing the log of visitors entering and leaving Cumbres del Ajusco National Park on the day of Ms. García Gámez's disappearance, and the video surveillance records available in locations that may be relevant to her case; (vi) gathering information on the vehicles assigned to the two Tlalpan mayor's office officials mentioned above, in particular the historical records of their geolocation since Ms. García Gámez's disappearance.

11. According to the applicants, the State submitted a report dated October 6, 2025, in response to the Committee's request. Based on this report, details were provided on the proceedings carried out by the Office of the Attorney General of Mexico City (FGJCDMX).<sup>12</sup> According to the request, the State failed to comply with the recommendations as it did not investigate the hypothesis of enforced disappearance; did not investigate obstructions to the investigation; did not identify/interview officers who obstructed the search; did not obtain telephone and GPS records from officers; did not provide a copy of the requested investigation file; and, after three months, did not have a concrete action plan.

12. At the same time, the applicants have raised serious criticisms regarding the performance of the Public Prosecutor's Office and other public institutions in the case. In this regard, on September 19, 2025, the applicants requested that the Public Prosecutor's Office provide details on the investigation and location plan to be followed in the coming months. The applicants indicated that they have not received a response. On September 25, 2025, the applicants raised concerns that officers from Agency 2A of the Public Prosecutor's Office met behind closed doors with an unidentified man who was accompanying a female witness for 15 minutes. This man allegedly instructed the witness "not to say anything unless asked specifically"; and when asked for the identity of this man, it was stated that he was "sent by the Ejido [communal land held by a group of farmers in Mexico] Commissioner of Ajusco." On November 7, 2025 (the last day of the second week of searching for patterns), the residents reportedly did not allow the search to be completed in an area of Xitle due to safety concerns. The Search Commission decided to withdraw and suspend the search with almost 300 members of various authorities (including the Secretariat of Public Safety, the media, family members, and people searching in solidarity). On July 16, 21 and 22, August 1, and October 3, 2025, meetings were held between the proposed beneficiary's relatives and the various state authorities.<sup>13</sup>

<sup>11</sup> It details: Ms. Ana Amelí García Gámez; the two officers from the Secretariat of Security and Citizen Protection of the Tlalpan mayor's office who attended to Ms. García Gámez's relatives on the night of July 12, 2025, once they have been identified.

<sup>12</sup> In particular, it was reported that: i) on July 13 and 14, 2025, they launched an immediate search at the site of the disappearance, accompanied by the Specialized Immediate Search Support Group and the Rescue and Medical Emergency Squad, and carried out an institutional search; ii) An investigation file was opened, which triggered various immediate search actions, an institutional search was conducted, and the intervention of the investigative police was requested; iii) Requests for information were made to various institutions; iv) Registration in the National Registry of Disappeared and Missing Persons; v) Request for the dissemination of the flyer to various authorities such as the Tlalpan Mayor's Office, the Tlalpan territorial prosecutor, the General Chief, the Secretariat of Citizen Security, and the Mexico City Missing Persons Search Commission; vi) With regard to the Investigation Plan, it is being developed in accordance with the provisions of the Approved Investigation Protocol with the intervention of various specialists, in which they already have defined lines of investigation. This allegedly leads to the following research hypotheses: a) That the victim suffered an accident in the area where she disappeared; and b) That the victim was the victim of a crime of disappearance by private individuals; vii) They collected video recordings from C5; they carried out communications interception, as well as requesting data stored on the victim and various other individuals; viii) They interviewed witnesses, requested information from platforms, and conducted inspections of various properties in the area, with the assistance of experts and investigative police; ix) In relation to the summons of the two officers from the Secretariat of Citizen Security, they requested information from the Secretariat in order to be able to summon them; x) They requested information on the vehicles assigned to the two Tlalpan Mayor's Office officers, along with their GPS devices; xi) The Missing Persons Search Commission of Mexico City was in constant communication with the relatives of Ana Amelí García Gámez, which consisted of direct contact through the WhatsApp messaging application and telephone calls, supplementary interviews, in-person accompaniment to forensic medical services, active participation in operational deployments and search actions carried out based on clues provided by them, thus safeguarding their right to participation in accordance with the Approved Search Protocol (PHB); xii) On September 15, 2025, a chronological report of search actions was created; xiii) Information on field search actions from July 13 to September 9, 2025, was submitted; xiv) They report that family members have had participation and access to the investigation file, as well as to the searches that have been carried out and when they have requested that searches be carried out. The last time they had access to the file was on September 25, 2025. They also requested a copy, which was delivered to them on September 30, 2025; xv) They report that, to date, the family has not requested any type of protective measure.

<sup>13</sup> According to minutes and meeting agreements attached to the request.

13. The applicants questioned the fact that there were no agents in the field investigating, verifying alibis, or carrying out other activities necessary to locate the proposed beneficiary. Among other questions, they referred to the following:

- i. A search plan was not provided, nor were reports of the searches carried out since July 12.<sup>14</sup>
- ii. On several occasions, the Prosecutor's Office and the Context Analysis Unit were requested to provide the disappearance hypothesis and lines of investigation to locate the proposed beneficiary; however, to date, none exist.
- iii. The Office of the Attorney General of Mexico City (FGJCDMX) reportedly did not activate the Alba Protocol.
- iv. The State reportedly only considered two hypotheses: accident and disappearance by private individuals, excluding state involvement through action, omission, or acquiescence. Therefore, the applicants consider that it has not investigated the hypothesis of enforced disappearance.
- v. The National Search Commission allegedly focuses on massive database confrontations.<sup>15</sup> In the applicants' view, it is allegedly ineffective in cases involving possible state involvement and illegal detention, as its participation is limited and complementary.
- vi. The Special Prosecutor's Office for the Investigation and Prosecution of Crimes Related to Disappearance (FIPADE) has insufficient personnel, who lack adequate technical resources or specialized training.

14. The applicants concluded that the State: a) has not identified or interviewed the two Tlalpan officers who prevented the search (*supra* para. 4); b) has not investigated the obstruction by the Tlalpan officers, mentioned above (*supra* para. 6), nor the incident of witness intimidation allegedly occurred on September 25, 2025 (*supra* para. 12); c) does not obtain the telephone records of the suspected officers; d) does not have the GPS records of official vehicles (service logs); e) does not investigate the hypothesis of enforced disappearance; and f) does not investigate the Public Prosecutor's Office agent who refused to record the events. As a result, the applicants evaluated the possibility of collusion between authorities and potential perpetrators.

15. The applicants expressed concern about the time that had elapsed, the criminal context, and the alleged state obstruction, given the possibility that the proposed beneficiary was being held captive as part of the pattern of violence against missing women in Mexico, especially given her young age. They noted that she could be at risk of torture, sexual violence, cruel and inhuman treatment, or trafficking.

16. In summary, the applicants noted that the activities referred to by the State allegedly hides the reality of a failed investigation, which lacks solid lines of investigation and political will, and is conducted by outdated authorities.<sup>16</sup> They state that the investigation lacks substantive progress to locate the proposed beneficiary. After more than 140 days, field searches do not follow a line of investigation, are not guided by research hypotheses, and are "saturation" searches in general and scattered areas. They stressed that there is no forensic analysis of the route that the proposed beneficiary allegedly followed, and that the key individuals who saw her have not been interviewed in depth. They are demanding an investigation into the Tlalpan officials; the establishment of a comprehensive strategy with international oversight; the collection of critical evidence; in-depth interviews with witnesses; an investigation into the obstructions; and that the case be

<sup>14</sup> According to a complaint filed with the Human Rights Commission on September 9, 2025, attached to the request.

<sup>15</sup> The applicants refer to paragraphs 58-61 of the State response. In this regard, the State reported that the National Search Commission, as part of its efforts to locate all missing and unaccounted persons registered in the RNPDDO, conducts massive cross-checks of the system against other databases such as the National Population Registry, the National Electoral Institute, the National Migration Institute, records of persons deprived of liberty, and records of burials in mass graves, among others. In turn, the State adds that the generalized search for data conceives the conditions between databases as an indication of location, which are forwarded by the National Search Commission to the competent authorities for the search for each person. According to the State, it is an efficient and equitable method capable of generating, organizing, and disseminating large amounts of relevant information that is sometimes decisive in locating individuals. It is an ongoing task with a growing number of sources, resulting in the generation and dissemination of thousands of clues.

<sup>16</sup> According to a letter dated November 29, 2025, the applicants indicated that the Special Prosecutor's Office for the Investigation and Prosecution of Crimes Related to Disappearances (FIPADE) did not have personnel specialized in enforced disappearances involving state participation. The applicants believe that the agents of the Public Prosecutor's Office reportedly have no training in criminal context analysis.

brought to federal level, given the incompetence and collusion of local authorities, as it concerns a National Park (federal jurisdiction) and borders two states, which requires federal coordination.

## B. Response from the State

17. The State indicated that it had carried out the necessary and pertinent procedures to locate the proposed beneficiary. Similarly, it is reportedly using its resources to conduct the search and investigation in a coordinated manner, which includes the continuous involvement of the relatives. In this regard, it assessed that, internally, the case is being addressed and it does not consider it necessary for the IACtHR to issue precautionary measures.

18. Mexico also referred to the measures and steps taken to locate the proposed beneficiary. It stated that, given the personal circumstances, the conditions surrounding her disappearance, and the context of the locations where she was last seen, proceedings that reportedly show a heightened duty of diligence with a gender perspective have been impulsed. Thus, gender-based violence (sexual violence, human trafficking, or femicide) is considered as a hypothesis in investigations. For its part, the Commission for the Search of Persons of Mexico City, in coordination with Mexico City and federal authorities, has implemented a series of procedures, among which the following were detailed:

- i. Operational deployments and immediate search actions activated following the disappearance, with the support of police forces and the participation of multiple federal, state, and municipal institutions and authorities,<sup>17</sup> focusing on points of interest. These efforts have allegedly been carried out in accordance with the Alba Protocol and the Approved Protocol for the Search of Disappeared and Missing Persons;<sup>18</sup>
- ii. Generalized search with periodic nominal scans;<sup>19</sup>
- iii. Individualized search and execution of a search plan by the Commission for the Search of Persons of Mexico City with a gender perspective, in accordance with the Approved Protocol for the Search for Persons;<sup>20</sup>
- iv. Searches on LOCATEL [citizen information and assistance service platforms] and the National Detention Registry, searches on open networks, and consultation of open sources;

<sup>17</sup> Investigative Police, Secretariat of Sectoral Citizen Security Tlalpan, Auxiliary Police of the Tlalpan borough, Task Force (Zorros) and personnel of the Commission for the Search of Persons of Mexico City, among others.

<sup>18</sup> According to an official letter dated November 3, 2025, from the Mexico City Missing Persons Search Commission, with regard to reinforced duties and a differentiated approach, the Search Commission has a special duty to take action with a differentiated approach when it is apparent that the missing person is in a situation of vulnerability or greater risk. Paragraphs 3, 5, 6, 7, 11, 12, 17 and 19 of the Approved Search Protocol (PHB) establish these special duties, indicating that the tasks must be carried out in a clear, continuous, coordinated and informal manner, adopting a differentiated approach that considers the particular circumstances of the person. In the case of Ana Ameli García Gámez, given her personal circumstances, the conditions surrounding her disappearance, and the context of the place where she was last seen, this Commission has adopted a reinforced duty of diligence with a gender perspective. Consequently, gender violence (such as sexual violence, human trafficking, or femicide) has been comprehensively considered as a hypothesis in the investigations. In this sense, for the clarification of this case, the methodologies implemented have been immediate search (paras. 143 and following of the PHB); for which an operational deployment was carried out three hours after the event of the disappearance, generalized search (paras. 342 et seq. of the PHB) with periodic nominal scans, individualized search (paras. 143 and following of the PHB). For this, a search plan was designed and executed and a progress of context analysis, and search by patterns has been presented (paras. 305 et seq. of the PHB), working in a context analysis that allows to link this event with the other disappearance events in the Ajusco area.

<sup>19</sup> On August 1 and 8, visits were made to the Forensic Medical Service of the Metropolitan Area of the Office of the Attorney General of the State of Morelos with the aim of accompanying family members to review and verify files. Between September 23 and 26, 2025, requests for information were made to authorities in the country's 32 states, as well as to the Secretariat of Citizen Security (*Secretaría de Seguridad Ciudadana*), the Undersecretariat of the Penitentiary System (*Subsecretaría del Sistema Penitenciario*), the Executive Directorate of the Institute for the Care of Priority Populations (*Dirección Ejecutiva del Instituto de Atención a Poblaciones Prioritarias*), the Prosecutor's Office for the Investigation and Prosecution of Crimes Related to Disappearances (*Fiscalía de Investigación y Persecución de Delitos en Materia de Desaparición*), the Institute of Expert Services and Forensic Sciences (*Instituto de Servicios Periciales y Ciencias Forenses*), and the Secretariat for Women (*Secretaría de Mujeres*).

<sup>20</sup> The following measures were listed: interviews with witnesses and family members, conducted between July 16 and August 4, 2025; operational deployments carried out between July 25 and August 30, 2025, in Cerro Pico del Águila, Valle de las Cantimploras, Tinguillo, Mirador de Topilejo, and other surrounding areas, with inter-institutional participation and participation from civil society groups; The results of genetic testing, somatological records, search analyses, information cards, and requests for biometric data from the National Institute of Voters were documented.

- v. Interviews with the persons present during her journeys;
- vi. Presentation of a preliminary context analysis and pattern search,<sup>21</sup> which would allow to link this event with the other disappearance events in the Ajusco area;
- vii. Activation of registration of the proposed beneficiary in the National Registry of Disappeared and Missing Persons (*Registro Nacional de Personas Desaparecidas y No Localizadas*, RNPDNO);
- viii. Requests for information addressed to Offices of the Attorney Generals, as well as commissions for locating persons;
- ix. Ongoing communication with the family, supplementary interviews, in-person support for forensic medical services, participation in operational deployments and search actions carried out based on leads provided by them;
- x. Six working meetings between authorities and family members,<sup>22</sup> in order to strengthen inter-institutional coordination and expedite search and investigation actions, with agreements reached by the participants;
- xi. Work tables with the proposed beneficiary's family members and an interdisciplinary group consisting of staff from various institutions,<sup>23</sup> in which various agreements are allegedly made in order to assist in the research and achieve substantive progress in the location of the proposed beneficiary;
- xii. Access to information for family members on both the progress of investigations and the search efforts undertaken by the authorities, which is reportedly explained in meetings and working groups held with them;
- xiii. Professional support, emotional containment and continuous psychosocial accompaniment for family members throughout the process.

19. Regarding the investigation of the case, the State reported that the Special Prosecutor's Office for the Investigation and Prosecution of Crimes Related to Enforced Disappearance and Disappearance Committed by Private Individuals and the Search for Missing Persons (*Fiscalía Especializada para la Investigación y Persecución de los Delitos en Materia de Desaparición Forzada y la Desaparición Cometida por Particulares y Búsqueda de Personas Desaparecidas*, hereinafter "FIPEDF") had immediately opened an investigation file as soon as it became aware of the disappearance of the proposed beneficiary. In this regard, it stated that the investigation was in its initial stages, and that it included the participation of specialized personnel, the use of scientific and technological tools, and inter-institutional coordination. In addition, they also allegedly maintained constant communication with family members, guaranteeing them access to records at all times, as well as their participation in the investigation. The next steps to be taken include: cross-checking telephone calls, which will be requested from the supervising judge; reconstructing the events; and interviewing more persons involved in the events, among other investigative actions.

20. In turn, the State argued that the conduct allegedly reported in the complaint filed by the proposed beneficiary's father against the police officers had been investigated. The matter was reportedly referred to the Internal Affairs Unit, where a technical and legal analysis of the investigation file would be carried out. In the case the aforementioned study reveals the existence of irregularities attributable to ministerial staff in the administrative sphere, the corresponding sanctions will be imposed. Should the results of this investigation reveal the possible commission of criminal acts by any public servant involved in the investigation, the case will be referred to the Prosecutor's Office for the Investigation of Crimes Committed by Civil Servants (*Fiscalía de Investigación de Delitos Cometidos por Servidores Públicos*), so that it may determine

<sup>21</sup> The Search Commission developed a situational analysis that includes: a chronology of events, contacts made on the day of his disappearance and subsequent actions; a network of links, which connects the places where he was or could have been, clues that could be related to the search, and related individuals; systematization of the information collected, tracking of communications, interactions on social media, and interviews conducted; and local context of the area of disappearance.

<sup>22</sup> On July 16 and 21, August 4 and 20, and the most recent have been on September 10 and 26, 2025. According to the minutes, there was the participation of the Office of the Attorney General of Mexico City, the Commission for the Search of Persons of CDMX, the Cyber Police, among other authorities.

<sup>23</sup> Composed of: the Special Prosecutor's Office for the Investigation and Prosecution of Crimes Related to Enforced Disappearance and Disappearance Committed by Private Individuals and the Search for Missing Persons, an agent from the Public Prosecutor's Office, the Investigation Police, a representative of the Secretariat of Citizen Security, representatives of the Mexico City Missing Persons Search Commission, the Cyber Police, representatives of Collectives, representatives of the Rescue and Medical Emergency Squad, a representative of the National Search Commission, the victim's relatives, among others.

the appropriate legal action. The Office of the Attorney General of Mexico City also stated that, in response to the situation of risk reported by the indirect victims, the protective measures provided for in the National Code of Criminal Procedure had been adopted. Furthermore, in order to implement the appropriate measures, the Comprehensive Victim Care Center (*Centro de Atención Integral de Víctimas*) is allegedly required to assess the risk that the proposed beneficiary's parents face.

21. Lastly, the State considered that it would implement and deploy the necessary actions to guarantee the integrity and rights of the proposed beneficiary and their family members. In addition, it stated that the lines of investigation and the corresponding protection mechanisms would be kept open.

### 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 IACtHR. 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.<sup>24</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>25</sup> To do this, the IACtHR 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>26</sup> As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACtHR. 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>27</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;

<sup>24</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>25</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>26</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>27</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.

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.<sup>28</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>29</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 the Rules of Procedure, which can be resolved without making any determination on the merits.<sup>30</sup>

25. Considering the context in which the alleged facts took place, the Commission recalls that, in its 2015 report on the *Situation of Human Rights in Mexico*, it indicated that, for several years, it has closely monitored the disappearance of women in Mexico.<sup>31</sup> According to the information provided to the IACtHR, cases of disappearance and forced disappearance of women and girls occur in various areas of the country, which has generated alarm among civil society, as can be seen with requests for a declaration of gender alert in various states.<sup>32</sup> In 2022, the Commission expressed concern about the upsurge in violence against women, girls and adolescents in Mexico and urged the State to step up its efforts to investigate, prosecute, punish and provide reparation for gender-based violence.<sup>33</sup> The Commission received reports of femicides and women disappearing in the country. The National Search Commission reported that 24,600 women were reported missing.<sup>34</sup> In the same vein, the IACtHR considered that the reported cases should not be analyzed in isolation, but in a context of gender violence against women in the country, particularly acts of femicide, sexual and domestic violence.<sup>35</sup>

26. According to publicly available information, by June 3, 2025, the National Registry of Disappeared and Missing Persons records that there are more than 29,503 missing women in the country. In addition, women exceed the number of missing men. The causes of women’s disappearances are multidimensional. However, the close link between women’s disappearances and gender-based violence should be observed.<sup>36</sup> In turn, the information suggests that disappearances in Mexico are committed by state agents and private third parties, both separately and in ways that reveal possible collusion, which in some cases has been confirmed by the courts.<sup>37</sup> Currently, there is agreement among public authorities, Mexican

<sup>28</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.

<sup>29</sup> IACtHR, 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>30</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>31</sup> IACtHR, Report “Situation of Human Rights in Mexico”, OEA/Ser.L/V/II, Doc. 44/15, December 31, 2015, para. 179.

<sup>32</sup> IACtHR, Report “Situation of Human Rights in Mexico”, previously cited.

<sup>33</sup> IACtHR, Press Release No. 97/22, Mexico Must Take Urgent Measures to Eradicate Violence Against Women, May 10, 2022.

<sup>34</sup> IACtHR, Press Release No. 97/22, previously cited.

<sup>35</sup> IACtHR, Press Release No. 97/22, previously cited.

<sup>36</sup> University Network for Human Rights and FUNDAR, “Disappearances in Mexico: active impunity, and obstacles in matters of justice and search”, July 2024, para. 42, (Available only in Spanish).

<sup>37</sup> Ciudadanos en Apoyo a los Derechos Humanos A.C. (CADHAC), Communication of July 10, 2024, p. 2, (Available only in Spanish).

organizations, and international human rights bodies that the humanitarian crisis of disappearance of people in Mexico has a fundamental link with organized crime. According to the United Nations Committee on Enforced Disappearances (CED), “organized crime has become a central perpetrator of disappearances, with various forms of collusion and varying degrees of participation, acquiescence or omission of public servants.”<sup>38</sup>

27. In this context, the Commission also observes that, according to the parties, there have been other disappearances in the specific area, as well as the presence of criminal groups and cartels since 2002. At the same time, according to public information from the media of 2025, in the Ajusco region there are cases of disappeared or kidnapped people,<sup>39</sup> which has motivated their families to carry out search brigades.<sup>40</sup> The applicants consistently reported that there had been more than 100 disappearances in the area since 2010, as well as ongoing discoveries of human remains, adding that criminal groups were operating in the area.

28. Taking the above into account, when assessing the seriousness of the situation, the Commission considers the contextual arguments and the possible vulnerability of the proposed beneficiary in a specific and differentiated manner. The above, insofar as it concerns a young woman whose whereabouts are currently unknown, after communication was lost in the Ajusco area.

29. Regarding the requirement of *seriousness*, and in light of the aforementioned context, the Commission considers that it has been met, given that to date the proposed beneficiary's whereabouts remains unknown, following her disappearance on July 12, 2025, and after the report filed by her relatives the following day. Based on the information provided, the IACtHR notes that the proposed beneficiary allegedly disappeared after leaving in the morning for a walk in Cumbres del Ajusco National Park. As time passed, her family and friends have been unable to contact her, and to this day her whereabouts remain unknown.

30. In the same vein, the Commission notes that the United Nations Committee on Enforced Disappearances issued an Urgent Action in favor of the proposed beneficiary on September 22, 2025. On that occasion, as indicated in the communication attached to the file, the Committee expressed concern that, more than two months after the disappearance of the proposed beneficiary, the measures taken by the responsible authorities had still not clarified her fate or whereabouts. The Committee underscored the importance of immediate intervention by the authorities to search for and locate the disappeared person, and to protect her life and personal integrity, in accordance with its treaty obligations.

31. In that line, the Committee considered that the authorities in charge of the case had not established a comprehensive strategy and a concrete action plan for her search and the investigation of her alleged disappearance. It also considered that these authorities had not taken certain measures that could be relevant to the search and investigation processes.<sup>41</sup> Consequently, it made recommendations to the State, such

<sup>38</sup> United Nations Committee on Enforced Disappearances (CED), Report of the Committee on Enforced Disappearances on its visit to Mexico under Article 33 of the Convention, Report on the visit and findings, CED/C/MEX/VR/1, May 18, 2022, par. 13.

<sup>39</sup> EL PAÍS, [El Ajusco, no man's land: from natural reserve to clandestine cemetery](#), August 31, 2025, (Available only in Spanish).

<sup>40</sup> EL PAÍS, [El Ajusco, the natural reserve of disappeared persons](#), October 27, 2025 (Available only in Spanish).

<sup>41</sup> As indicated in the Committee's communication, these measures consist of the following: (i) Conduct a context analysis and ensure her incorporation, without delay, into the comprehensive search strategy in the case of Ms. García Gámez; (ii) Conduct an exhaustive search in the area where Ms. García Gámez disappeared, as well as in other areas that could be relevant to the search and investigation processes related to her case; (iii) Immediately identify, locate, and interview the following individuals in order to gather information that could shed light on the fate and whereabouts of Ms. Ana Amelí García Gámez: The two officers from the Secretariat of Security and Citizen Protection of the Tlalpan mayor's office who attended to Ms. García Gámez's relatives on the night of July 12, 2025, in front of the National Guard's Citizen Inspection Post; The two investigative police officers who were reportedly present on July 16, 2025, when a van with tinted windows arrived abruptly during a search operation, and who reportedly informed relatives about criminal operations in the area where the disappearance occurred; and the witnesses to the events; all other persons who may have information relevant to the case; (iv) Conduct a study of the data, call records, locations, and multimedia content received and generated from the cell phones of: Ms. Ana Amelí García Gámez; the two officers from the Secretariat of Security and Citizen Protection of the Tlalpan mayor's office who attended to Ms. García Gámez's relatives on the night of July 12, 2025, once they have been identified; (v) Collect, secure, and analyze: the log of visitors entering and leaving Cumbres del Ajusco National Park on the day of Ms. García Gámez's disappearance; the video surveillance records available in places that could be relevant to her case, including: a) The entrances, exits, and surroundings of Cumbres del Ajusco National Park; b) The

as: establishing a comprehensive strategy that includes an action plan and a timetable for the immediate search and thorough and impartial investigation of her alleged disappearance, taking into account all available information, including the context in which the events occurred; ensuring that the strategy adopted explores all existing investigative hypotheses in the case, including the possibility that the events in question constitute an enforced disappearance due to the possible involvement of State agents by action, omission, authorization, support, or acquiescence;<sup>42</sup> and a strategy with a differential approach, and that all stages of the search are carried out with a gender perspective.

32. Upon requesting information from the State, the Commission assesses the efforts made by its various institutions, as well as its commitment to continue managing the necessary measures to locate the proposed beneficiary. In particular, the IACtHR observes the proceedings and search actions that the State is conducting, as well as the lines of investigation opened on the facts, which are the subject of this matter. In this regard, it highlights that operations and search efforts have been underway since the disappearance, as well as the implementation of a search plan by the Commission for the Search for Persons of Mexico City with a gender perspective. Follow-up activities, meetings, working groups, and inter-institutional coordination are also being carried out, in addition to the commitments made by the entities involved, including: the Special Prosecutor's Office for the Investigation and Prosecution of Crimes Related to Enforced Disappearance and Disappearance Committed by Private Individuals and the Search for Missing Persons, the Public Prosecutor's Office, the Investigation Police, the Secretariat of Citizen Security, the Commission for the Search for Persons of Mexico City, the National Search Commission, and other public institutions, in order to continue agreeing on the necessary steps to locate the proposed beneficiary. In the same way, the IACtHR considers the support and assistance that the competent authorities are allegedly providing in favor of the proposed beneficiaries' relatives and their participation in this process to be relevant.

33. However, the Commission notes that it is undisputed that the whereabouts of the proposed beneficiary remain unknown, as nearly five months have passed since her relatives have been unable to contact her. In turn, the IACtHR lacks information on the implementation of the recommendations issued by the Committee on Enforced Disappearances in this matter, and on the suggested investigative measures. Moreover, given the reported circumstances, the Commission considers the family's fear that the proposed beneficiary may be subjected to aggression by those possibly holding her to be reasonable.

34. Furthermore, the Commission notes that the applicants question the actions of certain state agents who, for example, allegedly prevented the immediate search for the proposed beneficiary with the participation of family members on the day of the disappearance; refused to record the actions of criminal groups during the searches; were involved in a possible incident of witness intimidation; or did not consider the hypothesis of possible state involvement in the events that occurred, despite the family's repeated internal complaints.

35. In light of the available information, and without entering into an assessment of the legal situation of the facts, the Commission understands that the allegations reveal elements which, if not duly clarified, could impact on a diligent investigation and search for the proposed beneficiary. In this regard, the

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park's booths equipped with video surveillance cameras; c) The National Guard's Citizen Inspection Post at the start of the Picacho-Ajusco circuit, where Tlalpan City Hall officials met with Ms. García Gámez's relatives on the day of her disappearance; and (vi) Information on the vehicles assigned to the two Tlalpan mayor's office officials mentioned above, in particular the historical records of their geolocation since Ms. García Gámez's disappearance.

<sup>42</sup> According to the attached communication on the Committee's decision, it recalled the following allegations: The area where Ms. Ana Amelí García Gámez allegedly disappeared is marked by links between state agents and criminal actors, including in relation to the occurrence of disappearances; (ii) Two officers from the Secretariat of Security and Citizen Protection of the Tlalpan mayor's office allegedly prevented Ms. García Gámez's relatives from entering the place where the disappearance occurred to conduct a search, ordering them to leave. Subsequently, rescue personnel reportedly indicated that this instruction was incorrect and that they should return to the site, which would have prevented search efforts from being carried out immediately after the disappearance; (iii) More than two months after her disappearance, the fate and whereabouts of Ms. Ana Amelí García Gámez remain unknown.

Commission observes that the investigations into certain State agents are still pending and there is no information on concrete progress.

36. In the Commission's opinion, given the seriousness of the situation involving the disappearance of a young woman in an area where criminal groups are believed to operate and where there is a history of missing persons, it is important for the state to act with the utmost diligence. On this point, the Commission acknowledges that the State recognizes the relevance of the application of the principle of enhanced due diligence with a gender perspective. However, the proceedings outlined in the Approved Protocol for the Search of Disappeared and Missing Persons do not provide any information on differentiated actions considering the gender-based risk factor in the particular case of the proposed beneficiary. Similarly, there is no information available on the specific search activities that are allegedly being carried out under the Alba Protocol, or specific information on the gender-sensitive measures that are reportedly being implemented in this case, given the context in which the events take place. The Commission recalls that, in response to reports of missing women, such as in contexts of violence, there is a duty of strict due diligence with regard to searching for them during the first hours and days. In particular, the Inter-American Court has indicated that:

"Since this obligation of means is more rigorous, it requires that exhaustive search activities be conducted. Above all, it is essential that police authorities, prosecutors and judicial officials take prompt immediate action by ordering, without delay, the necessary measures to determine the whereabouts of the victims or the place where they may have been retained. Adequate procedures should exist for reporting disappearances, which should result in an immediate effective investigation. The authorities should presume that the disappeared person has been deprived of liberty and is still alive until there is no longer any uncertainty about her fate."<sup>43</sup>

37. In view of the foregoing, although the Commission is not called upon to qualify the domestic investigations and processes in this procedure, it notes that actions aimed at determining the whereabouts or fate of a disappeared person are directly related to the need to prevent harm from occurring to their rights and that, until their situation has been clarified, the proposed beneficiary would face a serious risk.<sup>44</sup> The Commission recalls that in cases involving recent disappearances, it has found that, despite the investigative steps and search efforts undertaken by the State, risk factors persist as long as the whereabouts of the disappeared person remain unknown and the facts of the case have not been clarified.<sup>45</sup>

38. In view of the foregoing, taking into account the specific characteristics of this matter, and in light of the *prima facie* assessment standard of the precautionary measures mechanism, the Commission observes that the rights to life and personal integrity of Ana Amelí García Gámez are at serious risk, to the extent that her fate or whereabouts are unknown to date and there is no information that points to the clarification of the facts that gave rise to this request.

39. Regarding the requirement of *urgency*, the Commission deems that it has also been met, to the extent that the passage of time without establishing the proposed beneficiary's whereabouts is likely to generate greater impact on her rights to life and personal integrity. In this regard, since more than four months

<sup>43</sup> I/A Court H.R., Case of González et al. ("Cotton Field") v. Mexico, Preliminary Objection, Merits, Reparations, and Costs, Judgment of November 16, 2009, Series C No. 205, para. 283.

<sup>44</sup> I/A Court H.R., Matter of Alvarado Reyes et al., Provisional Measures regarding the United States of Mexico, Order of May 26, 2010, para. 9. See also: IACtHR, Resolution 43/2020, Precautionary Measure No. 691-20, Facundo José Astudillo Castro regarding Argentina, August 1, 2020, para. 25; Resolution 69/2023, Precautionary Measure No. 845-23, Silvestre Merlin Domínguez et al. regarding Mexico, November 20, 2023, para. 25.

<sup>45</sup> IACtHR, Resolution No. 48/2025, Precautionary Measure No. 19-25, Julia Chuñil Catricura regarding Chile, July 14, 2025; Resolution 12/2025, Precautionary Measure No. 1350-24, Edwin Edgardo Lainez Ordoñez regarding Honduras, February 2, 2025; Resolution 69/2023, Precautionary Measure 845-23, Silvestre Merlin Domínguez and another person regarding Mexico, November 20, 2023; Resolution 1/2023, Precautionary Measure No. 42-23, Ricardo Arturo Lagunes Gasca and Antonio Díaz Valencia regarding Mexico; Resolution 24/2022, Precautionary Measure No. 449-22, Bruno Araújo Pereira and Dom Phillips regarding Brazil, June 11, 2022; Resolution 86/2021, Precautionary Measure No. 869-21, Antônio Martins Alves regarding Brazil, October 21, 2021; Resolution 24/2018, Precautionary Measure No. 81-18, Náthaly Sara Salazar Ayala regarding Peru, April 8, 2018.

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have passed since her whereabouts have been known, the Commission considers it necessary to adopt immediate measures to safeguard her rights.

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

41. Lastly, the Commission notes that, although information was provided on members of the proposed beneficiary's family, the allegations focused on the proposed beneficiary, and therefore it does not have sufficient factual elements to assess their situation. Notwithstanding, the Commission recalls the obligations that the State has in her favor under the terms of Article 1(1) of the American Convention.

#### **IV. BENEFICIARY**

42. The Commission declares Ana Amelí García Gámez, who is duly identified in this proceeding, as the beneficiary.

#### **V. DECISION**

43. The Inter-American Commission deems 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 Mexico:

- a) redouble its efforts to determine the situation and whereabouts of Ana Amelí García Gámez, in order to protect her rights to life and personal integrity;
- b) ensure that the comprehensive search plan considers differentiated measures due to gender, and respond to the recommendations issued by the UN Committee on Enforced Disappearances and the questions raised by the family; and, as appropriate, provide the relatives with an explanation for their inclusion or dismissal in the actions to be implemented;
- c) continue to promote smooth and periodic channels of communication with relatives and their representatives on the progress made with respect to the comprehensive search plan and on the open lines of investigation, indicating the reasons for the inclusion or dismissal of the hypothesis of possible state participation in the events reported, and provide information on new proceedings; and
- d) update on the actions taken to investigate the alleged events that led to the adoption of this resolution, so as to prevent such events from reoccurring.

44. The Commission requests that the State of Mexico 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.

45. The Commission emphasizes that, in accordance with Article 25(8) of its Rules of Procedure, the granting of this precautionary measure and its adoption by the State do not constitute a prejudgment on any violation of the rights protected under the applicable instruments.

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

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47. Approved on December 12, 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 IACtHR.

Tania Reneaum Panszi  
Executive Secretary