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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 17/2024**

Precautionary Measure No. 402-17  
Jair Krischke regarding Uruguay  
April 8, 2024  
Original: Spanish

**I. SUMMARY**

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of Jair Krischke, in Uruguay. At the time of making the decision, the Commission assessed the actions taken by the State during implementation, the progress in the procedures to mitigate the risk, as well as the lack of information from the representation. The representation sent its last communication on October 15, 2019, and did not respond to the requests for information issued between 2019, 2022, and 2023. Upon not identifying compliance with the procedural requirements, the IACHR has decided to lift these measures.

**II. BACKGROUND INFORMATION**

2. On June 21, 2017, the IACHR decided to request the adoption of precautionary measures in favor of Jair Krischke, in Uruguay. The request for precautionary measures alleged that the beneficiary was at risk after having received death threats due to his work in the promotion of judicial cases and the clarification of the events that occurred during the Uruguayan military dictatorship. It was reported that the threats were made against various authorities, justice operators, and human rights defenders which were condemned by the Commission in a press release published March 1, 2017.<sup>1</sup> Upon analyzing the submissions of fact and law, the IACHR considered that the information presented showed, *prima facie*, that the beneficiary was in a serious and urgent situation. Consequently, in accordance with Article 25 of the Rules of Procedure, the Commission requested that Uruguay:

- a. adopt the necessary measures to guarantee the life and personal integrity of Mr. Jair Krischke;
- b. adopt the necessary measures so that Mr. Jair Krischke can carry out his work as a human rights defender without being subjected to threats, harassment, or acts of violence within the framework of his duties;
- c. consult and agree upon the measures to be adopted with the beneficiary and his representatives; and
- d. report on the actions taken to investigate the alleged facts that gave rise to the adoption of this precautionary measure, so as to prevent such events from reoccurring.<sup>2</sup>

3. Representation is exercised by Mr. Jair Krischke and Ms. Francesca Lessa.

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

**A. Procedure throughout the time the measures were in force**

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<sup>1</sup> IACHR. [IACHR Condemns Death Threats in Uruguay](#). Press Release No. 021 of 2017. March 1, 2017.

<sup>2</sup> IACHR. [Jair Krischke regarding Uruguay \(PM-402-17\)](#). Resolution 20/2017 of June 21, 2017.

4. During the time the precautionary measures were in force, the Commission has followed up on the subject matter of these precautionary measures by requesting information from the parties. In this regard, communications have been received from the parties and from the IACHR on the following dates:

	<b>State</b>	<b>Representation</b>	<b>IACHR</b>
2017	June 29	No communications	September 21
2018	May 17, July 5 and 9, October 2, 5, and 17, November 2, December 7 and 14	May 3, June 8, July 2 and 17, September 29, October 4, December 4	May 8, June 29, July 6, October 1, 2, and 15, December 11
2019	January 8, October 22	October 15	October 17, December 3
2022	N/A	N/A	January 14
2023	October 26	December 16	August 4, November 6, December 14 and 18

5. In its communication of October 26, 2023, the State requested that the measures be lifted. The request to lift was forwarded to the representation on November 6, 2023 as established in Article 25.9 of the IACHR Rules of Procedure. In turn, the request for information of August 4, 2023 was reiterated at this time. These requests were again sent on December 14, 2023. On December 16, 2023, Ms. Francesca Lessa indicated that she could not find the State's report in her account on the Portal of the Individual Petition System of the IACHR, and requested that it be submitted via email. The annexes, along with the latest communications, were again forwarded to the email addresses on register on December 18, 2023. The deadlines granted to the representation have since expired.

**B. Information provided by the State**

6. On June 29, 2017, the State reported that on February 14, 2017, file 121/2017 was initiated before the 16th Division Criminal Court (*Juzgado Letrado Penal de 16 Turno*) due to the recorded threats. The server of the sender's e-mail address belonged to the "torr" domain of the "deep internet" or "Deep web". According to the specialists, it was "practically impossible to obtain an identity of the location or the individual who created the account and sent the e-mail". However, it was detected that the IP was from the United States, and support was requested from the Department of Computer Engineering. In addition, a subpoena was issued to a company in the United States to obtain information on the sender. In turn, work was carried out with the Department of Informatics and Web Analysis of the Ministry of the Interior, in consultation with the Technological Crimes Section of INTERPOL. Additionally, it was reported that the Ministry of the Interior remained alert regarding the daily routines of the persons who received the threats. They reportedly contacted all the persons who received them, including three individuals who were no longer in Uruguay, such as the beneficiary. In addition, they allegedly held meetings and provided a contact number for constant communication in the event of any incident, act, or suspicion that an incident could occur or be related, either objectively or subjectively, to the threat. It was added that communication has been maintained with almost all of these individuals, and they have been kept updated on the the investigations. It was stated that there have been no subsequent communications of a similar nature. No elements have emerged that confirms existence of the group "Comando General Barneix" or activities of any kind in its name. Regarding the beneficiary in particular, it was indicated that he carried out a previously planned trip to Montevideo for the presentation of his book. He reportedly performed the activity without any inconvenience and without any incidents that put him at risk.

7. On May 17, 2018, the State referred to the request for extension of the precautionary measures in favor of Ms. Lessa. It was reported that the Court handling the "Comando General Barneix" case

and the Ministry of the Interior were informed of Ms. Francesca Lessa's intention to return to the country. For this reason, an active custody service with the characteristics and under the terms requested by Ms. Lessa has been provided. They requested that the representation provide as much specific information as possible at their earliest convenience, including exact dates and times of arrival and departure, point of entry, contact points or persons, etc., in order to organize the corresponding service. By note of July 5, 2018, the State reiterated the willingness to provide the security service with the characteristics and in the terms requested by the representation: police custody 24 hours a day, from time of arrival to departure from the country. Furthermore, it requested that the representation submit the necessary information to this end. On July 9, 2018, they detailed the composition of the security detail and its availability from the time of Ms. Lessa's arrival to her departure from the country.

8. On October 2, 2018, following communication from the beneficiary that the proposed beneficiary would be visiting Montevideo, "exact arrival and departure details, points of entry into the country, place of accommodation, his schedule in Uruguay or places he planned to visit, as well as contact details of Mr. Krischke and other relevant persons, and any other information deemed relevant" were requested. On October 5, 2018, it was updated that, after repeated attempts to communicate by various means, they were finally able to contact Mr. Krischke on the afternoon of October 4. He reportedly forwarded the necessary details to make the corresponding coordination actions with the Ministry of the Interior to ensure his protection. On October 17, 2018, it was reported that active personal custody was to be implemented, in the terms and under the conditions agreed upon with the beneficiary. They provided information on the officer in charge and the composition of the security detail that was to provide him security from the time of his arrival at the airport until his departure from the country, as well as the availability according to Mr. Krischke's schedule. On December 7, 2018, it was indicated that arrangements were made with Mr. Krischke for his December 2018 trip, "that fulfilled the same characteristics as the previous occasion." On December 14, 2018, all prior coordination and pertinent arrangements were made to provide the security measures. On January 8, 2019, the State shared an email from Mr. Krischke, where he reports that his stay was very peaceful, thanks to the security agents who were very attentive and dedicated to give him the best conditions. He mentions that there were no problems whatsoever. On October 22, 2019, it was added that personalized and active custody was coordinated, under the terms and conditions agreed with the beneficiary, for his trip from October 22 to 28, 2019.

9. On October 26, 2023, the State provided an update from the Supreme Court, noting that on November 27, 2019, several individuals, including the beneficiary, requested an investigation into new threats issued by the "Comando General Barneix" that were allegedly received on November 23, 2019. On March 5, 2021, the Court hearing the case was informed that it was identified that N. J. G. N. could be the intellectual author of the email that included threats to several judges and authorities, and that the "Commando" is allegedly composed of people who follow his ideologies or, even that it could be only himself, under the use of pseudonyms of his own creation. On September 2, 2021, the indictment with imprisonment of this individual was issued, as the alleged perpetrator of "a crime of aggravated private violence". There is reportedly semi-full proof that he is the author of the threats made against multiple persons (referred to) by the self-named "Comando Barneix" via email of January 2017. On April 8, 2022, the sentence against him was confirmed by the Court of Criminal Appeals. It was added that he was also heard for the repeated crimes of public incitement to commit a crime, statutory criminal offense, incitement to hatred, contempt, among others. In January 2023, the substitution of his pre-trial detention for house arrest was ordered. The State referred that, in view of the information reported by the Supreme Court of Justice on the proceedings, and considering that Mr. Jair Krischke is not in Uruguay, the precautionary measures should be lifted.

### **C. Information provided by the representation**

10. On May 3, 2018, the representation requested the extension of the precautionary measures in favor of Francesca Lessa, stating that she was also threatened by the self-named "Comando Barneix" in

February 2017. The above was due to the fact that she had planned to travel to Uruguay in mid-July 2018 to meet with an NGO that brings together human rights organizations in Uruguay, as she is an international consultant for this organization. Following the threats, both the Italian Embassy in Montevideo and the University of Oxford, where she works, asked her to leave Uruguay immediately, even though she had planned to carry out a 24-month research project. She went abroad, given that there were no security measures in place and the State did not offer her protection. She did not publicly denounce the threats either. She only received an e-mail from police intelligence referring to the threat. In turn, security specialists from Oxford University recommended that “Ms. Lessa should not return to Uruguay under any circumstances in the near future”. The representation mentioned the investigation opened by the State and the meeting held by the Ambassador of Italy with the judge hearing the case. They noted that hundreds of people have requested that the President of Uruguay issue protection measures in favor of the threatened individuals and have received no response.

11. The representation indicated that there continues to be a pattern of intimidation and threats against people who investigate crimes against humanity committed in Uruguay in 1970 and 1980. In July 2017, journalist Juan Correa received a death threat via WhatsApp following an article he wrote related to a former military officer who had been denounced for torture. In October 2017, two threats against forensic anthropologists were recorded: firstly, an attempted robbery in a warehouse of an Artillery Group and, secondly, the entry of a drone that flew for 20 minutes over the area of a battalion. Both locations are where the Secretariat of Human Rights searches for remains of missing persons as a result of State terrorism. In November 2017, Prosecutor Jorge Díaz was threatened by the “National Restoration Command” (*Comando de Restauración Nacional*). The extension was also requested for the other 11 people included in the death threats. It considered that, since those responsible for the threats had not been identified or arrested, the threat remains in force. Specifically, 24-hour police custody was requested in favor of Ms. Lessa during her stay in Uruguay between July 10 and 14, 2018.

12. In her letter of June 8, 2018, Ms. Francesca Lessa indicated that she accepted the State’s offer of police custody in the terms she requested, but that she has not had contact with State authorities to organize her trip, and then provided her contact details in order to be able to coordinate the custody service. In relation to a request from the IACHR to provide additional information on the situation that places them at risk, it referred to what was stated in its previous communication, only reiterating what was argued therein. She added that on May 24, 2018, a press release was published on the lack of progress in the investigation of the theft in a warehouse of the group of anthropologists, and also stated that they do not observe progress in the case related to the threat of the Barneix Command, given that the authors had not been identified or arrested. The representation considered that, if she returned to Uruguay, she would face risk. By communication of July 2, 2018, she shared the details required by the State to organize her security service. On July 17, 2018, the representation confirmed that she was in Montevideo from July 14 to 16, 2018, and that she had police escorts during her stay. She added that the trip was a success, as she was able to carry out all the personal and business meetings planned, and stated that the agents who took care of her were very courteous and professional.

13. On September 29, 2018, Mr. Jair Kruschke indicated that he planned to be in Montevideo from October 17 to 22, 2018 for a tribute to be paid for him by the Uruguayan parliament. He requested that the IACHR inform the Uruguayan government in order to guarantee his personal integrity. On December 4, 2018, Mr. Kruschke mentioned that he would be in Montevideo again from December 16 to 18, 2018 to participate in the publication of a report. On October 15, 2019, he indicated that he was going to stay in Montevideo from October 22-28, 2019 to give a lecture. On December 16, 2023, Ms. Francesca Lessa indicated that she could not find the State’s latest report in her account on the Portal of the Individual Petition System of the IACHR, and requested that it be submitted by email.

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

14. 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 established in Article 41(b) of the American Convention on Human Rights, as well as in Article 18(b) of the IACHR Statute. 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.

15. 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>3</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and protect the exercise of human rights.<sup>4</sup> To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and the vulnerability to which the persons proposed as beneficiaries would be exposed if the measures are not adopted.<sup>5</sup> Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under consideration by the organs of the inter-American system. They aim to safeguard 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. 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.

16. 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

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<sup>3</sup> See in this regard: I/A Court H.R. [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#). Request for Provisional Measures submitted by the IACHR regarding the Bolivarian Republic of Venezuela. Order of the Inter-American Court of Human Rights of March 30, 2006, considerandum 5; I/A Court H.R. [Case of Carpio Nicolle et al. v. Guatemala](#). Provisional Measures. Order of July 6, 2009, considerandum 16.

<sup>4</sup> See in this regard: I/A Court H.R. [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#). Provisional Measures regarding Venezuela. Order of the Court of February 8, 2008, considerandum 8; I/A Court H.R. [Case of Bámaca Velásquez](#). Provisional Measures regarding Guatemala. Order of the Court of January 27, 2009, considerandum 45; I/A Court H.R. [Matter of Fernández Ortega et al.](#) Provisional Measures regarding Mexico. Order of the Court of April 30, 2009, considerandum 5; I/A Court H.R. [Matter of Milagro Sala](#). Request for Provisional Measures regarding Argentina. Order of the Inter-American Court of Human Rights of November 23, 2017, considerandum 5 [only in Spanish].

<sup>5</sup> See in this regard: I/A Court H.R. [Matter of Milagro Sala](#). Request for Provisional Measures regarding Argentina. Order of the Inter-American Court of Human Rights of November 23, 2017, considerandum 5; I/A Court H.R. [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#). Provisional Measures regarding Venezuela. Order of the Court of February 8, 2008, considerandum 9; I/A Court H.R. [Matter of the Criminal Institute of Plácido de Sá Carvalho](#). Provisional Measures regarding Brazil, Order of the Inter-American Court of Human Rights of February 13, 2017, considerandum 6.

that caused the adoption of the precautionary measures persist. Furthermore, it shall consider whether there are new situations that may comply with the requirements outlined in Article 25 of its Rules of Procedure.

17. 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.<sup>6</sup> In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.<sup>7</sup> The Inter-American Court has indicated that the passage of a reasonable time without any threats or intimidation, in addition to the lack of imminent risk, may lead to lifting international protection measures.<sup>8</sup>

18. Entering into the analysis of keeping the precautionary measures in force, the Commission observes that it is pertinent to formulate a preliminary question regarding the request for the extension of precautionary measures. In this regard, by letters of May 3 and June 8, 2018, the representation, Francesca Lessa, requested to extend the protection in favor of herself and the 11 people included in the death threats. In relation to the 11 people, no details were received nor was their express agreement provided. Regarding Ms. Francesca Lessa, the Commission noted that the request was based on the threats received in January 2017 in which she was included, as well as on events of violence she identified regarding other persons. However, more recent and specific risk events against her have not been detailed given that she was provided timely protection in her favor during her visit to Uruguay from July 14 to 16, 2018. The IACHR highlights the satisfaction and recognition expressed by Ms. Lessa in her communication of July 17, 2019, regarding the police security received during her stay. Subsequently, no information was provided on possible situations that placed her at risk. In this regard, the Commission considers that there are no grounds to analyze extending these precautionary measures.

19. In view of the fact that the State requested that the precautionary measures be lifted in its communication of October 26, 2023, and in accordance with Article 25 of the Rules of Procedure, it was forwarded to the representation to issue its observations on November 6, 2023. This request was reiterated on December 14 and 18, 2023. Having reiterated the requests for information and having expired the deadlines granted, the Commission will proceed to carry out the analysis of the procedural requirements being in force.

20. The Commission recalls that the precautionary measures were granted for the protection of Mr. Jair Krischke, due to threats received by the self-named “Comando Barneix” in January 2017. In this regard, the Commission takes careful note of the measures implemented by the State, consisting of:

- Protecting their life and integrity. The State provided personalized police custody during each of Mr. Jair Krischke’s visits to the country, from the time of his arrival to his departure. The information available indicates that these visits took place from October 17 to 22, 2018, from December 16 to 18, 2018, and from October 22 to 28, 2019.
- Development of his activities as a human rights defender. The activities Mr. Krischke attended in Uruguay were of various sorts: to receive a tribute for his work, to participate in the presentation of a report, or to give a lecture in connection with his work as a human rights defender. When analyzing the available information, the Commission understands that the security measures provided allowed him to carry out his activities in Uruguay.

<sup>6</sup> I/A Court H.R. [Matter of Fernandez Ortega et al.](#) Provisional measures regarding Mexico. Order of February 7, 2017, considerandums 16 and 17.

<sup>7</sup> I/A Court H.R. [Matter of Fernandez Ortega et al.](#) Order of February 7, 2017, considerandums 16 and 17.

<sup>8</sup> I/A Court H.R. [Matter of Fernandez Ortega et al.](#) Order of February 7, 2017, considerandums 16 and 17.

- Agreement: For each of the trips reported, the State showed its willingness to provide protection measures, it sought contact with the beneficiary and guaranteed, even in the terms requested, integral, prompt, and complete protection during each period requested.
- Risk mitigation: Following the granting of precautionary measures, the State reported on the investigations opened for the threats made in January 2017, indicating challenges to identify the source. However, following new threats on November 27, 2019, investigative actions led to the identification of N. J. G. N. as the intellectual author of the 2017 threats. He was arrested and prosecuted and even had his sentence confirmed on appeal on April 8, 2022. The Commission highlights the importance of these actions to mitigate the risk, having identified the person who issued the threats on behalf of the “General Barneix Command”.

21. In this regard, the Commission recognizes the protection measures implemented by the various state institutions within the framework of their competencies, which, from a concerted perspective, have guaranteed the protection of the beneficiary and advanced the investigations which led to the identification and conviction of the person identified as the mastermind of the threats.

22. Moreover, regarding the analysis of an ongoing risk, the Commission notes that it has not been updated on new facts against the beneficiary. Furthermore, more than seven years having elapsed since the threats of 2017 and more than four years since those of 2019. In addition, Mr. Jair Krischke no longer resides in Uruguay and has not communicated any upcoming plans to travel to Uruguay in the near future.

23. At the same time, the IACHR recalls the importance of updating the information on the situation that places the proposed beneficiary at risk. In this regard, it is noted that the last report received from the representation is from October 15, 2019. Subsequently, information was requested on December 3, 2019, reiterated on January 14, 2022, but no response has been received. In addition, information was requested from both parties on August 4, 2023, but the representation did not issue a response despite its reiteration on November 6 and December 14, 2013. Upon receiving communication from the representation confirming that they received communication and requesting the report be forwarded, it was again reiterated on December 18, 2023. Thus, the representation had not answered the requests for information since its communication of October 15, 2019, and more than four years have passed without any new reports and the deadlines have since expired.

24. In the matter at hand, considering the analysis carried out, the Commission acknowledges the measures implemented by the State and does not observe that the situations that places the proposed beneficiaries at risk are still in force, in addition to the mitigation of the source of risk, the fact that the beneficiary does not reside in the country, and the lack of response from the representation. For these reasons, it understands that it does not currently have elements to support compliance with the requirements of Article 25 of the Rules of Procedure. Given the above, and taking into account the exceptional and temporary nature of precautionary measures,<sup>9</sup> the Commission considers that it is appropriate to lift these measures.

25. In line with what was indicated by the Inter-American Court in various matters,<sup>10</sup> a decision to lift cannot imply that the State is relieved from its general obligations of protection, contained in Article 1.1 of the Convention, within the framework of which the State is especially obliged to guarantee the rights of

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<sup>9</sup> I/A Court H.R. Matter of Adrián Meléndez Quijano et al. Provisional Measures regarding El Salvador. Order of the Court of August 21, 2013, para. 22; Matter of Galdámez Álvarez et al. Provisional Measures regarding Honduras. Order of the Inter-American Court of Human Rights of November 23, 2016, para. 24.

<sup>10</sup> I/A Court H.R. Matter of Velásquez Rodríguez. Provisional Measures regarding Honduras. Order of the Inter-American Court of Human Rights of January 15, 1988, Considerandum 3, and Matter of Giraldo Cardona et al. Provisional measures regarding Colombia. Order of the Inter-American Court of Human Rights of January 28, 2015, Considerandum 40. [Case of Vélez Loor v. Panama. Provisional Measures](#), Order of the Inter-American Court of Human Rights of May 25, 2022.

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persons at risk and must promote the necessary investigations to clarify the facts, followed by the consequences that may be established. Furthermore, also based on the assessment of the Inter-American Court, the lifting of the precautionary measures does not imply a possible decision on the merits of the dispute.<sup>11</sup>

26. Lastly, 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 Uruguay to respect and guarantee the rights recognized therein, including the life and personal integrity of the persons identified in the matter at hand.

**V. DECISION**

27. The Commission decides to lift the precautionary measures granted in favor of Jair Krischke, in Uruguay.

28. 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 is a situation that meets the requirements established in Article 25 of its Rules of Procedure.

29. The Commission instructs its Executive Secretariat to notify this resolution to the State of Uruguay and the representatives.

30. Approved on April 8, 2024, by Roberta Clarke, President; Carlos Bernal Pulido, First Vice-President; José Luis Caballero Ochoa, Second Vice-President; Arif Bulkan; and Andrea Pochak, members of the IACHR.

Tania Reneaum Panszi  
Executive Secretary

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<sup>11</sup> I/A Court H.R. Matter of Guerrero Larez. Provisional Measures regarding Venezuela. Order of the Inter-American Court of Human Rights of August 19, 2013, Considerandum 16, and Matter of Natera Balboa. Provisional Measures regarding Venezuela. Order of the Inter-American Court of Human Rights of August 19, 2013, Considerandum 16.