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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 84/2024**

Precautionary Measure No. 967-19  
Delsa Jennifer Solórzano Bernal, her work team, and P.L.I.S.  
regarding Venezuela  
November 12, 2024  
(Follow-up, Modification, and Extension)  
Original: Spanish<sup>1</sup>

**I. INTRODUCTION**

1. Between 2023 and 2024, the Inter-American Commission on Human Rights (hereinafter “the Inter-American Commission”, “the Commission” or “the IACHR”) received requests for extension of precautionary measures filed by the organization *Defiende Venezuela* urging the IACHR to request that the Bolivarian Republic of Venezuela (hereinafter “Venezuela” or “the State”) protect the rights of P.L.I.S. and the members of Delsa Jennifer Solórzano Bernal’s work team<sup>2</sup> in the country. According to the request, the proposed beneficiaries are at risk in the country’s current context due to their relationship with the beneficiary.

2. Pursuant to the provisions of Article 25 of its Rules of Procedure, the Commission requested information from the State on March 6, July 12, August 21 and 22, 2023; as well as January 31, July 8, August 15, and September 3, 2024, in order for it to rule on the requests for extension. The State has not replied to the IACHR, and the granted deadlines have expired.

3. The Inter-American Commission on Human Rights (IACHR) decides to issue this follow-up resolution on precautionary measures in the terms of Article 25 of its Rules of Procedure. The Commission regrets the lack of State response regarding the measures adopted to implement these precautionary measures. According to the information provided by the representation, the IACHR considers that the situation that Ms. Delsa Jennifer Solórzano Bernal faces continues to exist. It also decided to extend the precautionary measures in favor of Jonatan Gerardi, Eliannys Vidoza, Axel Espinoza, Daniel Murolo, María Isabel Gudiño, Valentina Rodríguez, and P.L.I.S. as it considers that they share the risk that is the subject of these precautionary measures. Therefore, the Commission requested that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Delsa Jennifer Solórzano Bernal, the members of her work team, and P.L.I.S., duly identified in this resolution;
- b) implement the necessary measures, with a gender perspective, to guarantee that the beneficiaries can carry out their political activities without being subjected to threats, harassment, or acts of violence;
- c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and
- d) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

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<sup>1</sup> This public version omits information of the official resolution that has been notified to both parties, due to a request from the representation after the adoption of this resolution.

<sup>2</sup> Throughout the process, the representation identified various individuals, some of whom withdrew from the team. The current team is made up of six people: Jonatan Gerardi, Eliannys Vidoza, Axel Espinoza, Daniel Murolo, María Isabel Gudiño, and Valentina Rodríguez.

## II. BACKGROUND INFORMATION

4. On December 24, 2019, the IACHR decided to grant precautionary measures in favor of then member of the house of representatives, Delsa Jennifer Solórzano Bernal, in Venezuela. The information provided indicated that she had been subject to harassment and threats since 2017, and that it had been reported that there had been an assassination attempt against her and another representative. In addition, it was reported that she was being harassed by groups while she was working as a representative, due to public accusations against her. Upon analyzing the submissions of fact and law provided by the applicant, the Commission considered, pursuant to the applicable *prima facie* standard, that Ms. Delsa Jennifer Solórzano Bernal was in a serious and urgent situation, given that her rights faced a risk of irreparable harm. Therefore, pursuant to Article 25 of its Rules of Procedure, it requested that the State of Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Delsa Jennifer Solórzano Bernal;
  - b) consult and agree upon the measures to be adopted with the beneficiary and her representation; and
  - c) report on the actions taken to investigate the alleged facts that gave rise to the adoption of this precautionary measure, so as to prevent them from reoccurring.<sup>3</sup>
5. The organization *Defiende Venezuela* exerts representation before the Commission.

## III. SUMMARY OF INFORMATION PROVIDED BY THE REPRESENTATION FOLLOWING THE GRANTING OF THE PRECAUTIONARY MEASURE

6. Following the granting of the precautionary measure, the Commission has continued to monitor and follow up on this matter by means of requesting information to the parties under the terms of Article 25(10) of the Rules of Procedure.<sup>4</sup> No response has been received from the State of Venezuela, despite the various requests for information. The representation reported that the State did not implement any protective measures in favor of the beneficiary during the time the precautionary measures have been in force.

### A. Information provided by the representation

7. In 2020, when the beneficiary was still a representative, the representation referenced instances of aggression against her by the Bolivarian National Guard (GNB) and so-called *colectivos* (pro-government civilian groups known for suppressing opposition) in Venezuela.<sup>5</sup> Between 2022 and 2023, the beneficiary, who was then the president of the political party *Encuentro Ciudadano*, communicated that she was going to run for president of Venezuela and began a political tour across the country. The representation provided a detailed and chronological account of the beneficiary's trips, from April 2022 to June 2024, and described being monitored and followed at each location. She reported visiting various locations across Anzoátegui, Sucre, Miranda, Barinas, Zulia, Monagas, Caracas, Táchira, Yaracuy, Nueva Esparta, Aragua, Bolívar,

<sup>3</sup> IACHR, [Resolution 22/2019](#), Precautionary Measure No. 967-19, Delsa Jennifer Solórzano Bernal regarding Venezuela, December 24, 2019 (Available only in Spanish).

<sup>4</sup> Information was received from the representation on January 10 and May 11, 2020, February 28, April 10, August 15, and December 18, 2023, as well as June 28, August 13, and September 2, 2024. For its part, the IACHR has issued requests for observations and information to the representation on September 26, 2022, and to both parties on March 6, July 12, July 12, August 21 and 22, 2023, January 31, July 8, August 15 and September 3, 2024.

<sup>5</sup> On January 5, 2020, in the early morning hours, a group of representatives were evicted from the Paseo Las Mercedes Hotel by state agents for allegedly having an explosive device. That same January 5, when attempting to enter the session of the National Assembly, a group of representatives were denied entry by members of the National Guard, among whom was representative Delsa Solórzano. On January 6, 2020, while trying to enter the Legislative Palace, the beneficiary and another group of representatives were surrounded by *colectivos*, and were subjected to aggressions, shoved, and had tear gas bombs thrown at them. On January 7, a group of representatives, including the beneficiary, attempted to enter the Legislative Palace. They succeeded around 11:30 AM, but the session had to be suspended when power was cut off, likely a deliberate move to disrupt their actions.

and more, while noting continuous surveillance by officers from the Bolivarian National Intelligence Service (SEBIN), the Directorate General of Military Counterintelligence (DGCIM), and the Scientific, Penal, and Criminal Investigation Corps (CICPC). According to the representation, these officials followed them in their travels and places of lodging across the country. They also photographed and recorded their movements and stays in hotels. It was alleged that officials set up mobile roadblocks to obstruct and delay the transit of the beneficiary and her team in the cities.

8. According to the information provided to the IACHR, the beneficiary and her team were subjected to surveillance and harassment through individuals in vehicles and motorcycles, which sometimes involved official vehicles. The beneficiary identified that she is constantly followed by three vans without license plates, a car, and two motorcycles. These vehicles allegedly carry individuals, who are sometimes in civilian clothes and sometimes in uniform, and who have even infiltrated her events. During the journey from Portuguesa and Yaracuy to Caracas, it was reported that when the beneficiary's vehicles and those of her team managed to evade the officials, the latter drove aggressively to catch up with them, putting them at risk of an accident. A photograph was provided showing an unmarked vehicle following them in Carabobo state, with a person visibly holding a phone outside the window recording the incident. It is reported that when the beneficiary and her team stopped in Aragua state, an unmarked vehicle made a sudden U-turn to try to catch up with them. This action forced other vehicles on the road to suddenly brake (photographs were provided showing vehicles tailing them and recording the incident with their phones). In Lara state, young men in civilian clothes stood in front of the team's vehicles, who identified themselves as "officials", proceeded to photograph and followed them in their vehicles in various parts of the city. The representation reported that they even changed vehicles to continue the surveillance. While on the road, the vehicles drove at high speeds and performed maneuvers to overtake the beneficiary's vehicle and her team. They took photographs while driving and even got out of their vehicles to take pictures when the group stopped at a park (photographs documenting these events were provided as evidence.)

9. The representation indicated that, at the locations where they stayed, state officials searched their rooms without authorization. After booking rooms at other hotels, minutes later they received calls canceling their reservations. The beneficiary had several interviews scheduled which were subsequently cancelled because the DGCIM threatened to shut down the radio stations if they interviewed her. On one occasion, in May 2023, they went to the state of Barinas, where the beneficiary was interviewed on the radio. After the interview, the host was taken off the air in retaliation. On the journey through Barinas, they were followed by people who changed vehicles on several occasions and plainclothes officers took photographs of the participants and equipment during the protests. At a press conference, a plainclothes official entered the venue and began photographing the media present. He then left in a vehicle without license plates, which had previously been observed by the beneficiary and her team at other locations they had visited in Barinas.

10. During the protests in the pre-election period, specific situations were reported to prevent them from taking place. For example, in the municipality of Boconó, Trujillo, the governor from the ruling party, along with SEBIN and DGCIM, threatened to take over the location if the event was allowed to proceed. Despite this threat, the event was held. An official told the head of the beneficiary's team: "Careful with what you're doing because you don't know who you're messing with." Upon noticing the beneficiary and approaching, the official withdrew. Officers from SEBIN and DGCIM set up checkpoints on the surrounding streets, which frightened those who intended to attend the event. Subsequently, in the state of Zulia, they were detained by GNB officers and, when they were let go, they realized that they were being recorded. Upon arriving at the airport to take a flight to Caracas, SEBIN officers unnecessarily searched and stripped two female members of the team.

11. On February 24, 2023, the president of the *Encuentro Ciudadano* party in Sucre state passed away, and the beneficiary and her team attended the funeral. The memorial could not take place in peace, as SEBIN officers arrived at the funeral home, parked in front of it, took photographs, and occupied spaces inside

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the building. The applicant provided a photograph and stated the following: “we couldn’t even mourn our colleague in peace.”

12. On June 22, 2023, the official registration before the National Primary Commission took place in preparation for the upcoming presidential election in Venezuela. At a march in Caracas, the beneficiary’s security team identified officers in civilian clothes recording and taking photographs of those who participated. At an event welcoming the beneficiary, an unknown individual entered the room and began taking photographs. When it was discovered that the person was not part of the press team, they fled through the hallways of the venue.

13. The representation argues the existence of an articulation between SEBIN, DGCIM, GNB, and the Bolivarian National Police (PNB) to carry out acts of persecution, expanding the fleet of vehicles and officers that follow them. These officials reportedly directly photographed them and threatened to deprive them of their liberty if they obstructed the photographs. Officials allegedly even follow them when they go out to buy cigarettes or use public restrooms. They state that these acts cause deep fear and anxiety about potential harm, keeping them in a constant state of alert. They argued that filing complaints with state institutions could place them in a situation of risk, as it would expose them to arrests. They have chosen to make public complaints on social networks, where the beneficiary has more than 1.1 million followers, as they consider this a platform to visible and expose the attacks. They add that this is considered “*noticia criminis*” in criminal legislation and is considered a form of complaint. They point out that Attorney General Tarek Williams Saab has used the viral spread of content on social media to order investigations and the capture of individuals. However, they clarify that when the state itself is the perpetrator, no such investigations are ordered.

14. The representation shared coverage from Diosdado Cabello, the representative and Vice President of the United Socialist Party of Venezuela (PSUV), on his program “Con el Mazo Dando,” which included images and videos of the beneficiary’s activities. They argued that this serves as evidence that she has been followed and recorded. On April 26, 2023, Diosdado Cabello shared a video with a mocking tone, featuring a song in the background and saying, “I want to be president.” He made fun of her appearance, commenting on her size, her clothing, and even referring to her as “*qué mensa*” (what a fool). In the video, he further mocked her candidacy, suggesting in a sarcastic tone that she is his candidate, while María Corina Machado is the candidate of Nicolás Maduro. On May 17, 2023, he transmitted a video that began with the driver saying “Delsa Jennifer’s time has come. The time has come. Give it all, Delsa” shows images of the beneficiary on the campaign trail, embracing and meeting with people, as well as speaking publicly. In a mocking tone, the host ridicules the beneficiary by suggesting she is his candidate, while asking those around him if she is really his candidate or if María Corina is. He refers to the beneficiary as “*Delcita*” and “*Jennifercita*,” in an attempt to belittle her in front of his audience.

15. Between July 25 and August 10, 2023, Ms. Solórzano reportedly received threats via Facebook, including the following messages: (a) “Delsa, don’t bother dressing up, you’re not going anywhere, Nicolás is the one going”; and (b) “We are pissed off with you, the Venezuelan people and the collective forces of the ELN are going to kill you, damn rat. Go PSUV, your political party is shit. Diosdado Cabello has all the power, you’re nobody, bitch”; (c) “Fernando Villavicencio has fallen, now it’s Delsa Solórzano’s turn, so that it’s clear that socialism and the Bolivarian revolution of Chávez, Maduro, and Diosdado will always win.” These facts were publicly denounced by the beneficiary, who expressed fear that the threats could materialize, especially in the context of Venezuela and in light of the assassination of Ecuador’s presidential candidate, Fernando Villavicencio. In this regard, the Attorney General of Venezuela reportedly appointed the human rights prosecutor to investigate the threats received and, in turn, President Nicolás Maduro offered protection from the State security forces. However, the representation argues that this is not credible, considering that it is the Venezuelan security forces who have been harassing and monitoring her since she began her political tour. Additionally, no investigation has been carried out by the Public Prosecutor’s Office regarding the incidents reported since the precautionary measures have been granted.

16. During a visit to the states of Anzoátegui and Monagas on September 17, 2023, it was reported that after being followed throughout the day by state security agencies, the beneficiary decided to confront them, with the support of the people who were with her. In response, the public officials made dangerous maneuvers on their motorcycles, which frightened the beneficiary and her team, as well as the people attending the event. The motorcyclists intimidated attendees and supporters of the *Encuentro Ciudadano*. After the event, unidentified vehicles and motorcycles followed the beneficiary and her team. They noted that on October 17, 2023, the beneficiary received new messages with threats on Facebook:

Traitor to the Homeland, how dare you declare against our President Nicolás Maduro and lie, talking about a supposed death threat, you are crazy, you are going to be disqualified for treason, you are not going to win because the primaries are not going to happen, the right-wingers will not return. You've already had a political death, Stupid Solórzano. I hope you get sued for defamation and slander. Chávez will live forever, you're just wasting your time fighting for something that will never happen. You won't come back.

I've followed you many times and I'm just waiting for the opportunity to face you, I'm going to attack you Delsa, I'm going to attack your family, you won't come back. Drop out of the primaries peacefully or you'll have to face me the hard way, I'm going to destroy you, damn bitch, enough of you being a gossip and ridiculous, causing a scene, you're not worthy of being president, only Nicolás is president. Damned be the name of Delsa, who will never reach the presidency, right now, you are being controlled by me, I have you under black magic.

17. The representation reported that, in the primary elections of October 2023, María Corina Machado was the winner. In a communication dated June 28, 2024, it was reported that six members of the beneficiary's team decided to leave due to the harassment they were receiving, as they feared arbitrary detention or physical harm. The representation stated that, since March 2024, a vehicle with identifiable license plates has been following the beneficiary on a daily basis. The car has been observed parking in front of her home. In addition, another identified vehicle, that does not have a license plate, has also circled her residence and followed the beneficiary in her daily routine. It is reported that the surveillance is ongoing, even during activities such as going out to eat, events that have been covered on the program "Con el Mazo Dando" by Diosdado Cabello, who has commented on at least three visits of the beneficiary to commercial establishments, adding misogynistic remarks and personal attacks. In his show, Representative Cabello refers to her in a grotesque and misogynistic way, according to the representation.

18. In 2024, it was reported that the beneficiary's party joined the Democratic Unitary Platform (PUD), offering strong support for the candidacy of Edmundo González Urrieta alongside María Corina Machado. The beneficiary participates in the political management between the parties and "attends, plans, and coordinates rallies, and organizes the monitoring of the vote", which led to a growth in her status. They added that the State has attempted to raid the *Encuentro Ciudadano* headquarters at least four times in the year, which has been avoided with the beneficiary talking with officials. On August 13, 2024, it was reported that Venezuela has been experiencing a period of intense violence and political unrest following the July 28, 2024 elections, in which the National Electoral Council (CNE) declared Nicolás Maduro the winner. However, the opposition claims to have won the elections and denounces electoral fraud, and massive protests have been reported.

19. Lastly, in its last communication of 2024, it was noted that the beneficiary served as one of the three opposition witnesses for the Venezuelan presidential elections held on July 28, 2024, to be present at the National Electoral Council during the electoral process. However, on election day, both she and the other two witnesses, Juan Carlos Caldera and Perkins Rocha, were denied access to the CNE headquarters. This was publicly denounced at a press conference, alleging that this prevented the electoral directors from channeling the incidents of the electoral process in real time. After the elections, witnesses to the electoral process have been persecuted for having witnessed irregularities during the election, such as obstruction of the vote count



in some neighborhoods and malfunctioning voting machines. The foregoing, as a strategy of intimidation and repression by the government to silence any questioning of the results issued by the CNE.

20. In this regard, the representation notes that the beneficiary has played a crucial role as one of the main spokespersons for the PUD before, during and after the July 28 elections. They add that her participation has been significant in the electoral process, as one of the main spokespeople for the PUD candidate, as she has participated in the coordination of electoral strategies, organized campaign events, and was appointed as a representative before the National Electoral Council. This has involved reporting irregularities and possible electoral fraud, coordinating the network of electoral witnesses, and demanding transparency from the CNE. They also highlight that the beneficiary has access to sensitive electoral information, making her a priority target for the ruling government. Her role has led her to be placed under increased surveillance by the authorities. On this point, they add that the beneficiary has confronted those who are pursuing her, who have confirmed that they are officials and are carrying out a “static surveillance operation.” Additionally, images have been documented (a video and compilation photographs are provided) of vehicles without license plates parked in front of the beneficiary’s residence since July 28, 2024. This has kept Delsa Solórzano’s family and the *Encuentro Ciudadano* team under constant pressure due to surveillance and ongoing harassment. In these circumstances, she claims that on August 13, 2024, a man in civilian clothes attempted to enter the beneficiary’s building several times and was prevented by the building’s security.

21. Considering the beneficiary’s current situation, details of her work team that accompanies her are provided:

- i. Valentina Rodríguez Lanz is the chief operating officer and national representative coordinator of the *Encuentro Ciudadano*. She coordinates events and logistics, which has exposed her to persecution by the State. The applicant details that the constant harassment has resulted in “a paralyzing fear,” having to avoid going outside or on long journeys, particularly in remote areas of the city. The fear, which was never present before, is now “a reality that conditions her daily life.”
- ii. Axel Espinoza is the national political secretary in charge of environmental analysis. They reported that, during a tour in Cabudare, Lara state, he was followed and identified by a SEBIN group, despite being surrounded by civilians. They sought to intimidate him and hinder his work of collecting and analyzing information.
- iii. Eliannys Vidoza is responsible for audiovisual production and is also the party’s national youth coordinator. During a trip in Vargas state, there was a confrontation with *colectivos* and supporters of Nicolás Maduro’s government, where the proposed beneficiary was physically assaulted. She received blows to her ribs and chin.
- iv. Daniel Murolo is the communications and strategy coordinator and has also taken on the responsibility of delivering food to the so-called “political prisoners,” which puts him in a position of greater risk. They point out that he has received direct threats from security officials to imprison him. In addition, his work to disseminate truthful information about atrocities committed by the government makes him a priority target.
- v. Jonatan Gerardi and María Isabel Gudiño are head of security and bodyguard, respectively. They have been witnesses and victims of the escalation of repression in recent months.

22. Regarding P.L.I.S., it was stated that he accompanies on trips, and is often at the offices of the *Encuentro Ciudadano* party.

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

23. The IACHR has not received a response from the State on the implementation of the precautionary measures. Nor has it received information proving that the State has been adopting measures during the time the measures have been in force. All deadlines granted to the State have since expired.<sup>4</sup>

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

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

25. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.<sup>6</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>7</sup> To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and how vulnerable the persons proposed as beneficiaries would be left in case the measures are not adopted.<sup>8</sup> As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. They aim to safeguard the rights at risk until the petition pending before the inter-American system is resolved. Their objective 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 render moot or disprove the *effet utile* of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, implement the ordered reparations.<sup>9</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;
- b. "urgent situation" refers to risk or threat that is imminent and can materialize, thus requiring immediate preventive or protective action; and

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<sup>6</sup> 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 (Available only in Spanish).

<sup>7</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>8</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>9</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).

- c. “irreparable harm” refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

26. 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.<sup>10</sup> Similarly, the Commission recalls that, by its own mandate, it is not called upon to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not called upon to determine any violation of the rights enshrined in the American Convention or other applicable instruments.<sup>11</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>12</sup>

27. With respect to the foregoing, Article 25.9 provides 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 evaluate whether the serious and urgent situation and the risk of irreparable harm that caused the adoption of the precautionary measures persist. Furthermore, it shall consider whether there are new situations that may comply with the requirements outlined in Article 25 of its Rules of Procedure. Similarly, Article 25.10 establishes that the Commission shall take appropriate follow-up measures, such as requesting relevant information from the interested parties on any matter related to the granting, observance and maintenance of precautionary measures. These measures may include, as appropriate, timetables for implementation, hearings, working meetings, and visits for follow-up and review. Through Resolution 2/2020 of April 15, 2020, the IACHR ruled on the possibility of issuing Follow-up Resolutions.<sup>13</sup>

28. On this occasion, the Commission decides to issue a *Follow-up, Modification, and Extension Resolution*, considering the information recently received, in light of the current situation that the beneficiary, her work team, and P.L.I.S. face in the context of the country. In this regard, the Commission will carry out the analysis as follows: i) Lack of response from the State in the matter at hand; ii) Current context of the State of Venezuela; iii) Ongoing risk in light of Article 25 of the IACHR Rules of Procedure; iv) Request for extension of the precautionary measures.

**(i) Lack of response from the State in the matter at hand**

29. The Commission states that it has not received official information from the State on the measures which are reportedly being adopted to implement these precautionary measures. Despite requests for information submitted to the State on March 6, July 12, August 21 and 22, 2023, January 31, July 8, August 15, and September 3, 2024, the IACHR has not received a response. The Commission regrets the lack of willingness of the State, since dialogue and agreement are essential for adequate implementation of precautionary measures and, ultimately, for the protection of the beneficiaries’ rights to life and integrity.

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<sup>10</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>11</sup> IACHR, [Resolution 2/2015](#), Precautionary Measure No. 455-13, Matter of Nestora Salgado regarding Mexico, January 28, 2015, para. 14; [Resolution 37/2021](#), Precautionary Measure No. 96-21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

<sup>12</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>13</sup> IACHR, [Resolution 2/2020](#), Strengthening of the Monitoring of Precautionary Measures in Force, April 15, 2020.



Without information from the State, it is impossible to know the possible efforts or progress that the State is making in order to protect the rights of the beneficiaries.

30. The Commission highlights that, according to the information provided by the representation, the State allegedly has constant knowledge of the beneficiary's situation, as even authorities and public officials mention her situation. Additionally, there have been reports of surveillance and being followed by individuals who claimed to be State officials. In addition, according to the representation, her situation is known given her profile on social networks. Notwithstanding the foregoing, the Commission notes that no protection measures have been adopted in her favor and that the alleged acts of harassment, threats, intimidation, monitoring, and harassment against the beneficiary have not ceased.

31. The Commission recalls that, according to the Inter-American Court, that the failure of the State to provide full information regarding the measures adopted in compliance with its decisions on international protection measures, such as precautionary measures, is of particular seriousness. This is due to the legal nature of these measures, which aim to prevent irreparable harm to individuals in situations of serious risk and urgency.<sup>14</sup> The duty to inform constitutes a dual obligation that requires, for its effective fulfillment, the formal presentation of a document on time and specific, true, current and detailed material references to the issues on which that obligation falls.<sup>15</sup>

**(ii) Current context of the State of Venezuela**

32. When analyzing compliance with the procedural requirements, Article 25(6) of its Rules of Procedure establishes that the Commission shall consider the context in which it is inserted. Therefore, the IACHR recalls the specific context of Venezuela, which it has been closely monitoring. Currently, this country is incorporated into Chapter IV.B of the Annual Report of the IACHR in accordance with Article 59, paragraphs 6.a.i, 6.a.ii, 6.d.i and 6.d.iii of its Rules of Procedure. In 2017, through its *Democratic Institutions, the Rule of Law and Human Rights in Venezuela Report*, the Commission documented "the weakness of democratic institutions and the progressive deterioration of the human rights situation in Venezuela."<sup>16</sup> At the same time, it highlighted the different interference of the Executive Branch on the other powers, in breach of the principle of separation, warning of decisions of the Supreme Court of Justice that affected the powers of the National Assembly (AN).<sup>17</sup> In its 2023 Annual Report, the Commission observed that the Executive Branch's control over the other branches persists, "the progressive concentration of power in the executive branch and the absence of the Rule of Law have been documented throughout these years."<sup>18</sup>

33. With regard to the *situation of the opponents or persons identified as opponents in Venezuela*, the Commission has been pronouncing itself over recent years.<sup>19</sup> In its 2017 Country Report, the Commission noted with concern the existence of a pattern of serious human rights violations for those who publicly demonstrate or assume dissenting positions, particularly with the Executive Power.<sup>20</sup> The Commission

<sup>14</sup> [I/A Court H.R. Matter of Communities of Jiguamiandó and Curvaradó regarding Colombia](#), Provisional Measures, Order of February 7, 2006, considerandum 16; and [Case of Luisiana Ríos et al. \(Radio Caracas Televisión – RCTV\)](#), Provisional Measures, Order of September 12, 2005, considerandum 17 (Available only in Spanish).

<sup>15</sup> *Ibidem*.

<sup>16</sup> IACHR, [Democratic Institutions, the Rule of Law and Human Rights in Venezuela](#), OEA/Ser.L/V/II, December 31, 2017, para. 43.

<sup>17</sup> IACHR, [Democratic Institutions, the Rule of Law and Human Rights in Venezuela](#), OEA/Ser.L/V/II, December 31, 2017, para. 44.

<sup>18</sup> IACHR, [2023 Annual Report. Chapter IV.b. Venezuela](#), December 31, 2023, paras. 1-2.

<sup>19</sup> See, in this regard: IACHR, Country Report, [Democratic Institutions, Rule of Law and Human Rights in Venezuela](#), December 31, 2017, para. 470; Press Release 22/2019, [IACHR Alarmed by Arrests in the Context of Protests in Venezuela, economic and social crisis](#), February 1, 2019; Press Release 91/2019, [IACHR Observes Persistent Human Rights Issues in Venezuela](#), April 5, 2019; Press Release 115/2019, [IACHR condemns the upsurge in attacks against members of the National Assembly of Venezuela](#), May 14, 2019.

<sup>20</sup> IACHR, [Democratic Institutions, the Rule of Law and Human Rights in Venezuela. Country Report](#), December 31, 2017, para.

noted that this pattern was evident in multiple acts of harassment, persecution through media outlets, dismissal of public officeholders who were opposition politicians, political disqualification, violation of immunity, interference in public duties, irregular home searches, and acquiescence to violent acts against opposition members and, in general, those expressing dissent.<sup>21</sup> Harassment also takes the form of numerous stigmatizing pronouncements by high-ranking officials against opposition leaders.<sup>22</sup>

34. In line with the above, in its 2021 Annual Report, “persecution, accusations and harassment of opposition voices in Venezuela, as well as against people who express criticism of the government” was highlighted.<sup>23</sup> In this regard, in the 2022 Annual Report, the Commission considered the existence of a context of “context is characterized by harassment, persecution, arbitrary detentions, lack of transparency and stigmatizing accusations against those who investigate and actively participate in matters of public and political interest.”<sup>24</sup>

35. In addition, in its 2021 Annual Report, the Commission noted that temporary enforced disappearances have been systematically practiced in Venezuela, mainly against persons perceived as opponents.<sup>25</sup> These occur mostly due to the deliberate reluctance of the authorities to report the whereabouts of detained persons, as well as not bringing persons before the courts within the legal 48-hour period after detention.<sup>26</sup> In various testimonies collected by the IACHR, there is the suggestion that temporary forced disappearances are a tool of political repression in Venezuela.<sup>27</sup> In its 2023 Annual Report, the Commission observed the persistence of a coordinated repression policy, and recommended that the State of Venezuela refrain from carrying out illegal or arbitrary detentions. In cases where a person is deprived of liberty, the State should ensure that all due process guarantees are upheld, including prompt presentation before an independent judicial authority, in order to prevent enforced disappearances, torture, and other cruel and inhumane treatment.<sup>28</sup>

36. In the *context leading up to the 2024 presidential elections*, the Inter-American Commission on Human Rights warned about the political persecution of individuals. The IACHR became aware of the disqualification of María Corina Machado, who had won the opposition’s primary elections, for 15 years from holding public office, as communicated by the General Comptroller’s Office in a letter dated June 30, 2023. The Commission also reminded that similar disqualifications occurred in 2021, when the National Electoral Council (CNE) rejected 27 candidacies.<sup>29</sup> The IACHR acknowledged the significance of the agreements between the Venezuelan government and the Unitary Platform signed on October 17, 2023, in Barbados. Under these agreements, the government committed to establishing “a timetable and roadmap for presidential elections that guarantee the participation of all candidates without arbitrary restrictions, under equal conditions and with security guarantees.”<sup>30</sup> However, after the citizen consultation of October 22, 2023 to choose the opposition candidacy, the Public Prosecutor’s Office opened a criminal investigation against the organizers of the consultation.<sup>31</sup> The IACHR and its Special Rapporteur for Freedom of Expression (SRFOE, or RELE in Spanish) condemned these actions for contradicting the spirit of the agreements reached and for their

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<sup>21</sup> *Ibid.*, para. 164

<sup>22</sup> *Ibidem.*

<sup>23</sup> IACHR, [2021 Annual Report, Chapter IV.B. Venezuela](#), para. 123.

<sup>24</sup> IACHR, [2022 Annual Report, Chapter IV.B. Venezuela](#), para. 43.

<sup>25</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 82.

<sup>26</sup> *Ibidem.*, para. 82.

<sup>27</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 84.

<sup>28</sup> IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, Recommendation 8.

<sup>29</sup> IACHR, Press Release 155/2023, [Venezuela: IACHR Condemns Politically Motivated Persecution of Individuals in Run-Up to Elections](#), July 14, 2023.

<sup>30</sup> IACHR, Press Release 253/2023, [Venezuela: IACHR urges the State to implement agreements, with guarantees for political participation](#), October 27, 2023.

<sup>31</sup> *Ibidem.*

discouraging effect on political participation. They emphasized that it is essential not to criminalize initiatives aimed at promoting citizen participation.<sup>32</sup>

37. With regard to the **current post-electoral context**, the Commission condemned the serious human rights violations denounced during the repression of the post-electoral protests in Venezuela in light of the events that took place on July 28, 2024.<sup>33</sup> The IACHR was also informed of the repression of political opponents in the post-election context in Venezuela.<sup>34</sup>

38. On August 15, 2024, the IACHR and its Office of the Special Rapporteur for Freedom of Expression condemned practices of State terrorism in Venezuela, including violent repression, arbitrary detentions and political persecution.<sup>35</sup> It was stated that the current regime is using fear as a tool to silence citizens and maintain its authoritarian rule, and that Venezuela must immediately stop violating human rights and restore democratic order and the rule of law.<sup>36</sup> In this context, the Commission has received reports of arbitrary detentions and short-term forced disappearances, during which acts of sexual violence against women and other actions potentially amounting to torture were allegedly committed. These reports indicate selective deprivation of liberty targeting electoral volunteers and those perceived as opponents of the regime, including journalists, opposition leaders, human rights defenders, and university students.<sup>37</sup> Additionally, it was found that detainees were subjected to criminal proceedings for crimes defined in ambiguous and broad terms, without the opportunity to be represented by a defense counsel of their choice, as public defenders were imposed on them. The IACHR stressed that “the practices of state terrorism perpetrated by the current regime and observed by the Commission are not only aimed at the persecution of specific sectors, but also generate a climate of fear and intimidation among the Venezuelan population,” which “amount also to a denial of the right to political participation.”<sup>38</sup> On September 13, 2024, the IACHR condemned the forced exile of opposition presidential candidate Edmundo González. González left Venezuela on September 7, seeking international protection in Spain. According to opposition leader María Corina Machado, his decision was not made freely, but was rather a measure to safeguard his life, integrity, and freedom.<sup>39</sup>

39. In this context, the Commission has granted precautionary measures in favor of leaders and members of opposition parties or individuals critical of the current Venezuelan government. Many of these individuals supported Edmundo González’s candidacy or worked closely with María Corina Machado, who is also a beneficiary of these measures. Additionally, some of these individuals are currently missing after being detained.<sup>40</sup> For example, María Andreina Oropeza, state coordinator of the campaign command of Edmundo González;<sup>41</sup> Roland Oswaldo Carreño, national leader of the *Voluntad Popular* party;<sup>42</sup> Carmen Leonor García Azuaje, secretary of the opposition party *Alianza Bravo Pueblo* and electoral witness;<sup>43</sup> Freddy Superlano,

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<sup>32</sup> *Ibidem*.

<sup>33</sup> IACHR, Press Release 174/24, [Venezuela: IACHR and Special Rapporteur for Freedom of Expression Condemn Serious Human Rights Violations During Post-Election Protest Repression](#), July 31, 2024.

<sup>34</sup> *Ibidem*.

<sup>35</sup> IACHR, Press Release 184/24, [IACHR and SRFOE condemn State terrorism practices in Venezuela](#), August 15, 2024.

<sup>36</sup> *Ibidem*.

<sup>37</sup> *Ibidem*.

<sup>38</sup> *Ibidem*.

<sup>39</sup> IACHR, Press Release 215/24, [IACHR condemns forced exile of Edmundo González and acts of aggression at Argentina's embassy in Venezuela](#), September 13, 2024

<sup>40</sup> IACHR, [Resolution 22/2019](#), Precautionary Measure No. 125-19, María Corina Machado Parisca, regarding Venezuela, April 12, 2019 (Available only in Spanish).

<sup>41</sup> IACHR, [Resolution 46/2024](#), Precautionary Measure No. 862-24, María Andreina Oropeza regarding Venezuela, August 10, 2024.

<sup>42</sup> IACHR, [Resolution 50/2024](#), Precautionary Measure No. 883-24, Roland Oswaldo Carreño Gutiérrez regarding Venezuela, August 17, 2024.

<sup>43</sup> IACHR, [Resolution 54/2024](#), Precautionary Measure No. 900-24, Carmen Leonor García Azuaje regarding Venezuela, August 23, 2024.

national coordinator of the *Voluntad Popular* party;<sup>44</sup> Ana Carolina Guaita, journalist;<sup>45</sup> Perkins Rocha, legal coordinator of the *Vente Venezuela* party and representative of the *Comando Venezuela* before the National Electoral Council;<sup>46</sup> Eleanger David Navas Vidal, community manager of the newspaper “Oriental”;<sup>47</sup> Biagio Pilieri, national coordinator of the *Convergencia* party and member of the command of the presidential candidate of Edmundo González, and his son, Alfredo Pilieri, youth leader of *Convergencia*;<sup>48</sup> Nelida Sánchez, national coordinator of the NGO *Súmate*;<sup>49</sup> and Osmary Gabriela Sánchez.<sup>50</sup> In addition, the Commission has also followed up on the situation of Williams Dávila,<sup>51</sup> and Américo de Grazia.<sup>52</sup>

**(iii) Ongoing risk in light of Article 25 of the IACHR Rules of Procedure**

40. The Commission recalls that at the time these precautionary measures were granted, the beneficiary was serving as a member of the National Assembly. Between 2017 and 2019, she reported receiving death threats and harassment from unknown individuals and members of “*colectivos*.” Notably, it was also reported that an individual had been hired to kill her and another representative. In addition, it was alleged that she was being harassed by groups while she was working as a representative, due to public accusations against her. The IACHR notes, in turn, that in the decision to grant precautionary measures, it was assessed that the beneficiary exercised a role as an opposition representative.<sup>53</sup>

41. Based on the foregoing, the Commission will now proceed to analyze the persistence of the situation of risk in relation to the beneficiary Delsa Solórzano.

- First, the IACHR observes that harassment and violence against the beneficiary have persisted over time, since the precautionary measures were granted in 2019 up to present day. These actions have evolved in response to the political role she has played in Venezuela. The information provided highlights incidents of violence against the beneficiary occurred during her time as an opposition member of the National Assembly in 2020. However, there was a notable increase in these events during 2022 and 2023, coinciding with her political campaign for the presidential candidacy. In particular, it was noted that when Ms. Solórzano joined the presidential campaign team of the opposition, both with María Corina Machado and presidential candidate Edmundo González, the surveillance and occasions of being followed persisted. Subsequently, these events continued prior to and around the July 28 elections. The beneficiary’s visible role during the electoral process was highlighted, as she served as one of the main witnesses before the National Electoral Council, alongside Juan Carlos Caldera and Perkins Rocha. From this position, she publicly denounced irregularities taking place during the election. Reports indicated that, as a result, her office and daily activities were subject to continued surveillance and harassment. The

<sup>44</sup> IACHR, [Resolution 55/2024](#), Precautionary Measure No. 899-24, Freddy Francisco Superlano Salinas regarding Venezuela, August 26, 2024 (Available only in Spanish).

<sup>45</sup> IACHR, [Resolution 58/2024](#), Precautionary Measure No. 907-24, Ana Carolina Guaita Barreto regarding Venezuela, August 27, 2024.

<sup>46</sup> IACHR, [Resolution 61/2024](#), Precautionary Measure No. 928/2024, Perkins Rocha Contreras regarding Venezuela, September 2, 2024.

<sup>47</sup> IACHR, [Resolution 62/2024](#), Precautionary Measure No. 937-24, Eleanger David Navas Vidal regarding Venezuela, September 2, 2024.

<sup>48</sup> IACHR, [Resolution 63/2024](#), Precautionary Measure No. 931-24, Biagio Pilieri Gianninoto and Jesús Alfredo Pilieri regarding Venezuela, September 6, 2024.

<sup>49</sup> IACHR, [Resolution 64/2024](#), Precautionary Measure No. 941-24, Nelida del Rosario Sánchez Oropeza regarding Venezuela, September 6, 2024.

<sup>50</sup> IACHR, [Resolution 67/2024](#), Precautionary Measure No. 952-24, Osmary Gabriela Sánchez Chirinos regarding Venezuela, September 27, 2024.

<sup>51</sup> IACHR, [Resolution 49/2024](#), Precautionary Measure No. 533-17, Williams Daniel Dávila Barrios regarding Venezuela (Monitoring and Modification), August 14, 2024.

<sup>52</sup> IACHR, [Resolution 51/2024](#), Precautionary Measure No. 359-16, Américo de Grazia regarding Venezuela (Monitoring and Modification), August 17, 2024.

<sup>53</sup> IACHR, Resolution 66/2019, previously cited, para. 36 et al.

- information received indicates an increase and intensification of harassment and violence, particularly as key moments approached, such as the recent presidential election. This escalation coincides with the context of post-electoral repression against the opposition, which has been previously described.
- Second, the IACHR observes the type of surveillance that was reported. According to the representation, the surveillance was continuous and conducted primarily by plainclothes officials in unmarked vehicles, who did not present the identification or legal warrants. These individuals photographed and recorded the beneficiary and her team. Therefore, without any apparent justification, acts of harassment were carried out in the areas where the team travelled or was staying overnight. This included intrusions into their privacy and even intimidation of those operating accommodations or providing services to the beneficiary and her team. In addition to this, the media was threatened with shutting down their transmissions if they received the beneficiary, which even materialized with radio stations that interviewed the beneficiary. Dangerous traffic actions that put the beneficiary's equipment and other drivers on the road at risk were frequently observed. The Commission also observes that the individuals who followed the beneficiary were constantly present at political events, took photographs, and recorded both the team and attendees. These individuals allegedly enter to observe the proceedings, obstruct access, and interfere with the normal course of activities. Following the political tours, the representation indicated that vehicle surveillance continued at the beneficiary's residence and around her daily routine.
  - As a third element, the Commission notes the possible motivation of these acts. According to the representation, the aim of these actions appears to be to disrupt the beneficiary's opposition political activities with the aim of preventing her from fulfilling her role, whether as a prospective candidate, a member of the opposition presidential candidate's team, or a principal witness before the electoral authority. Under these conditions, the IACHR notes that the beneficiary is a visible member of the opposition and that the exercise of her political rights are hindered by means of various acts against her.
  - As a fourth point, the Inter-American Commission highlights the tone of direct threats received, reportedly occurring in 2022 and 2023, including statements such as, "the Venezuelan people and the ELN collective forces are going to kill you, you damn rat." Go PSUJ, your political party is shit. Diosdado Cabello has all the power, you're nobody, bitch", or "Fernando Villavicencio has fallen, now it's Delsa Solórzano's turn", in reference to the presidential candidate killed in Ecuador days before receiving the message, in August 2023. Thus, on October 17, 2023, new direct threats were reported against him, which included issues such as "these crazy women are going to disqualify you for treason"; "you've already had a political death, Stupid Solórzano", or even direct threats such as "I've followed you many times and I'm just waiting for the opportunity to face you, I'm going to attack you Delsa, I'm going to attack your family, you won't come back", which states ". Drop out of the primaries peacefully or you'll have to face me the hard way, I'm going to destroy you, damn bitch, enough of you being a gossip and ridiculous, causing a scene." It is relevant that the new threats were accompanied by support for the ruling party, with the text "only Nicolás [Maduro] is president." The Commission notes that the threats received were constant and violent in content, especially directed at the beneficiary and in support of violence.
  - Fifth, there is a stigmatizing discourse with misogynistic overtones. In the program "Con el Mazo Dando", the high-ranking public official who hosts it has made stigmatizing and derogatory statements regarding the beneficiary. In particular, in the program of April 26, 2023, he questioned her clothing, her political aspirations, her size, and the use of the qualifier "mensa" which means "fool" or "stupid". Additionally, in the May 17, 2023, program, material from her tours was



reportedly revealed, alleged to come from ongoing surveillance, mocking her political stance and using diminutive, derogatory versions of her name, like “Delcita, Jennifercita.” In March 2024, the applicant reported that he continued to issue misogynistic comments.

- As a sixth point, and in close relation to the two previous points, the IACHR pays attention to the qualifications made in the public debate in order to berate the beneficiary for being a woman. In this regard, the use of qualifiers such as “bitch”, “damn rat”, “mensa”, or “Delcita, Jennifercita” stand out. The IACHR also notes that the adjectives used by Mr. Cabello, from his position of power, have been replicated in the death threats received by the beneficiary. In this regard, the IACHR recalls that violence against women in political life should be understood as “any action, conduct or omission, carried out directly or through third parties that, based on gender, causes harm or suffering to a woman or to various women, which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women of their political rights.”<sup>54</sup> One of the behaviors identified includes “threaten, frighten, harass, or intimidate, in any way, one or several women and/or their families with the effect or purpose of nullifying her/their political rights, including resignation of the position or function that they hold or exercise, or to which they postulate.”<sup>55</sup>
- Seventh, there is a lack of implementation of protection measures. Regarding the various reported incidents, the direct actions of state agents are significant. Instead of protecting the beneficiary, her team, and those attending events as they exercise their political rights, state agents reportedly engage in harassment and intimidation. There is no information indicating that any investigations have been opened to address these actions or to provide protection from third-party actors. Although the Attorney General has reportedly appointed a prosecutor to investigate the threats received in July and August 2023, no further action or determination is known to have been made. Moreover, President Maduro has reportedly offered protection following the aforementioned threats, but there is no information on the formalization of this offer or the search for actions to coordinate the best way to provide protection. The above, without prejudice to the distrust that these proposals causes in the beneficiary, as state agents are the ones who allegedly follow and monitor their activities. Given the foregoing the Commission has no information about the adoption or implementation of measures to protect the beneficiary, Delsa Solórzano, nor any progress on investigations to clarify the acts of violence against her. As a result, she remains in a state of vulnerability and lack of protection.

42. Considering the points highlighted, the Commission observes that the beneficiary has played a prominent and visible role within the opposition in Venezuela. This role led her to serve as one of the three primary witnesses before the electoral authority during the election. It has even been indicated that, for this reason, she has sensitive information on the election, which makes her a priority target of the government in the context of the context of repression identified by the IACHR. It is concerning that, according to the latest communication from the representation, surveillance, and ongoing harassment at the beneficiary’s residence continue. This includes identifying a man in civilian clothing who attempted to enter the building in August 2024.

43. The Commission notes that the allegations that have been presented by the representation are consistent with the context that the IACHR has been observing in its monitoring of Venezuela, particularly in light of the visible and leadership role of the beneficiary. Given the foregoing, the IACHR emphasizes that it has granted and followed up on precautionary measures to detained opposition members, including another of the three main witnesses before the electoral authority, Mr. Perkins Rocha, most of whom are in a situation of

<sup>54</sup> Inter-American Commission of Women, [Model Protocol for Political Parties: Preventing, Addressing, Punishing, and Eradicating Violence against Women in Political Life](#), 2019, OEA/Ser.L/II.6.22, p. 11.

<sup>55</sup> *Ibidem*.

disappearance after their detention by state agents. The Commission observed a consistent pattern of state actions following the detention of individuals perceived or identified as opposition members. These individuals are detained without knowledge of any criminal process against them and without judicial arrest warrants. Their places of detention are unknown, and they are often denied access to trusted legal representatives to protect their rights. Furthermore, there are serious restrictions on family members or lawyers, thereby hindering their communication and access to minimal information about the detainees' legal situations.

44. Consequently, considering the information provided by the representation during the time the measures have been in force, which shows constant events of harassment, follow-up, intimidation, harassment, threats, and violence, the Commission finds that the situation of risk has been maintained over time, and has even increased in accordance with the specific political moments in which the beneficiary has participated in the exercise of her political rights. In these conditions, in the Commission's opinion, a situation of seriousness, urgency, and the need to prevent irreparable harm persists, in light of Article 25 of the IACHR Rules of Procedure.

**(iv) Request for extension of the precautionary measures in favor of seven people (members of the beneficiary's work team)**

45. The representation has requested the protection of the following members of the beneficiary's work team: (i) Jonatan Gerardi, (ii) Eliannys Vidoza, (iii) Axel Espinoza, (iv) Daniel Murolo, (v) María Isabel Gudiño, and (vi) Valentina Rodríguez. Similarly, protection of (vii) P.L.I.S. was requested.

46. The Commission recalls that a requirement for the extension of precautionary measures is that the facts alleged have a "factual connection" with the events that justified the initial adoption of the precautionary measures.<sup>56</sup> In this regard, the Commission understands that the situation of the first six proposed beneficiaries has a factual connection with that of the beneficiary, inasmuch as they are part of her work team, and accompany the activities carried out by the beneficiary. For its part, the Commission considers that, regarding P.L.I.S., the factual connection is established from the link with the beneficiary.

47. In this sense, when analyzing the *seriousness* requirement, the Commission takes into special consideration that the beneficiary's team is with her during activities, especially having been exposed to surveillance, threat, intimidation, and harassment during the political tours carried out which has also affected the beneficiary, and have led them to decide to quit the team. The Commission notes that the roles of each member of the beneficiary's team have been reported, highlighting that these roles expose them to certain levels of risk due to their continuous presence and close accompaniment of the beneficiary. The Commission also pays attention to the specific situations reported for each person, particularly the impact on female members of the beneficiary's team. For example, it was alleged that on one occasion, SEBIN officers searched and stripped two women from the beneficiary's team. As for P.L.I.S., the Commission notes that he was also present on the political tours on various occasions and was exposed to the risks they entailed in the context of the country. During 2024, it was reported that his residence continued to be under surveillance and harassment, and that he is reportedly being directly monitored in his activities.

48. In this sense, considering the situations to which they have been exposed and the harassment and aggression to which the proposed beneficiaries have been subjected, the Commission concludes, from the applicable *prima facie* standard, that the rights to life and personal integrity of the seven identified persons are at serious risk.

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<sup>56</sup> I/A Court H.R., [Case of Fernández Ortega et al. v. Mexico. Provisional Measures](#), Order of November 23, 2010, considerandum 11 (Available only in Spanish).

49. In relation to the requirement of *urgency*, it is met to the extent that the proposed beneficiaries continue to carry out their activities as part of the beneficiary's team, and P.L.I.S. accompanies her, in the post-election context of repression against the political opposition already referred to. Under these conditions, it is considered that the harassment and harassment to which the proposed beneficiaries have been subjected is likely to continue, to the extent that they have been identified by their roles and continue to exercise their political rights. Given the lack of response from the State, the Commission does not have specific information that allows it to assess the actions that have been taken to address the alleged risk faced by the seven proposed beneficiaries in light of the post-election context that Venezuela is experiencing.

50. As it pertains to the requirement of *irreparable harm*, the Commission understands that it has been met, insofar as the potential impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

51. In these circumstances, having established the factual connection and considering the situation of risk that the seven persons face, the Commission concludes that the extension requested in their favor is granted.

## **V. DECISION**

52. The Inter-American Commission on Human Rights considers that a situation of risk continues to meet *prima facie* requirements of seriousness, urgency, and irreparable harm contained in Article 25 of its Rules of Procedure, in relation to Ms. Delsa Jennifer Solórzano Bernal, in the terms indicated throughout this resolution. It also finds that Jonathan Gerardi, Eliannys Vidoza, Axel Espinoza, Daniel Murolo, María Isabel Gudiño, Valentina Rodríguez, and P.L.I.S., face the same risk, and therefore decides to extend the measures in their favor.

53. Consequently, the Commission requests that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Delsa Jennifer Solórzano Bernal, the members of her work team, and P.L.I.S., duly identified in this resolution;
- b) implement the necessary measures, with a gender perspective, to guarantee that the beneficiaries can carry out their political activities without being subjected to threats, harassment, or acts of violence;
- c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and
- d) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

54. The Commission requests that Venezuela report within 30 days as from this resolution on the adoption of the required precautionary measures. Moreover, it is requested to submit periodic information on the status of implementation of the precautionary measures. Notwithstanding, the representation is requested to continue providing updated information on the threatening situation, as well as any additional information they deem pertinent.

55. The Commission instructs the Executive Secretariat to notify this Follow-up, Modification, and Extension Resolution to the State of Venezuela and to the representatives.

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56. Approved on November 12, 2024, by Roberta Clarke, President; Carlos Bernal Pulido, First Vice-President; José Luis Caballero Ochoa, Second Vice-President; Edgar Stuardo Ralón Orellana; Arif Bulkan; and Andrea Pochak, members of the IACHR.

Tania Reneaum Panszi  
Executive Secretary