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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 95/2024**

Precautionary Measure No. 203-24

**Antonio Miguel Rivera Escobar and Lenin Ernesto Rivera Escobar regarding  
Colombia<sup>1</sup>**

December 9, 2024

Original: Spanish

**I. INTRODUCTION**

1. On February 4, 2024, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received a request for precautionary measures filed by the Colombian Commission of Jurists (“the requesting party” or “the applicant”), urging the Commission to require that the State of Colombia (“the State” or “Colombia”) adopt the necessary measures to protect the rights to life and personal integrity of the brothers Antonio Miguel Rivera Escobar and Lenin Ernesto Rivera Escobar (“the proposed beneficiaries”). According to the request, the proposed beneficiaries are human rights defenders and seek justice for the murder of their father Antonio María Rivera Movilla in 2003 by paramilitary groups. It is alleged that they have been subjected to extortion and threats by illegal armed groups when they resumed productive activities on their father’s farms. This request is related to Case 12,881, pending before the IACHR, on the murder of Mr. Rivera Movilla, father of the proposed beneficiaries.

2. Pursuant to Article 25(5) of its Rules of Procedure, the IACHR required information from the State on April 30, 2024. The State submitted information on June 11, August 13, and October 22, 2024. For its part, the representation sent information periodically, providing a communication most recently on October 21, 2024.

3. Upon analyzing the submissions of fact and law offered by the parties, the Commission considers that the information presented shows *prima facie* that the proposed beneficiaries are in a serious and urgent situation, given that their rights to life and personal integrity are at risk of irreparable harm. Therefore, the IACHR requires that Colombia: a. adopt the necessary measures to protect the rights to life and personal integrity of Antonio Miguel Rivera Escobar and Lenin Ernesto Rivera Escobar; b. implement the corresponding actions so that the beneficiaries can continue their work of defense of human rights and search for justice in relation to the murder of their father; c. consult and agree upon the measures to be adopted with the beneficiaries and their representation; and d. report on the actions taken to investigate the alleged facts that led to this precautionary measure, so as to prevent them from reoccurring.

**II. SUMMARY OF FACTS AND ARGUMENTS**

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

4. Preliminarily, the requesting party recalled that the proposed beneficiaries are part of Case 12,881 before the IACHR. According to the request, the Rivera Escobar family owns the farms located in the municipality of Zapayan, Department of Magdalena, with names (i) “Doña Bertha,” (ii) “Las Mercedes,” y (iii) “San José,” since their father, Antonio María Rivera Movilla, was murdered on February 24, 2003, after being kidnapped, tortured, and coerced to sell those farms. It is alleged that the death of Mr. Rivera Movilla is the responsibility of the Northern Block of the United Self-Defense Forces of Colombia (*Bloque Norte de las*

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<sup>1</sup> In accordance with Article 17(2) of the Rules of Procedure of the IACHR, Commissioner Carlos Bernal Pulido, a Colombian national, did not participate in the debate and deliberation of this matter.

*Autodefensas Unidas de Colombia, AUC*) with the acquiescence of the State. He was forced to pay an amount to the paramilitary groups so that they would not attempt against his life or that of his family. After his murder, his assets were stolen and the estates occupied by paramilitaries.

5. The applicant indicated that the presence of paramilitary groups currently persists in the region of the Department of Magdalena, where the Rivera Escolar family farms are located. In the context of the reactivation of productive activities on family farms, on January 24, 2024, six hooded people, armed and dressed in civilian clothes, arrived on three motorcycles at the farm asking for the proposed beneficiary Antonio Miguel Rivera Escolar. The administrator of the property recognized that those people are the same ones who frequently demand payments in the area and responded to the armed actors by saying that Mr. Antonio Miguel Rivera Escolar was not there. On the same day, a person claiming to be a member of the “Gaitanista Self-Defense Forces of Colombia” (AGC) sent an audio recording intending to extort money from him. The following day, Lenin Ernesto Rivera Escolar filed a complaint with the Office of the Attorney General. On that occasion, he requested that the necessary measures be taken to guarantee the non-repetition of the events in which his father was murdered and recalled that he had been processing a petition before the IACHR.

6. On February 2, 2024, members of paramilitary groups reportedly returned to look for the proposed beneficiaries on the farms. On that occasion, they requested their contact details because “they need money for war expenses.” The following day, Antonio Miguel Rivera Escolar received a call in which they intended to extort money from him, demanding 20,000 pesos per hectare. The proposed beneficiaries registered the respective complaint with the corresponding authorities.

7. On February 9, 2024, a person identified as “Fabián” communicated via a message application with Antonio Miguel Rivera Escolar, warning him that, according to previous communications, the deadline to deliver the money was February 10. Subsequently, that person pressured him to make the delivery until February 11. After that event, the brothers filed a complaint again, receiving as a response from the state authorities that the information would be followed up. The applicant highlighted that on February 9 there was the murder of a young man perpetrated by the AGC in a town near the “Doña Bertha” farm and the place of residence of relatives of Antonio Rivera Escolar.

8. The requesting party added that the proposed beneficiaries met with officers of the Unified Action Group for Personal Freedom (GAULA) of the National Army, who stated that the most appropriate option in the face of the facts was to carry out “the controlled delivery of the extortion money.” This allegedly consists of a practice used by the Judicial Police as “an undercover criminal investigation technique that aims to obtain evidence that would not otherwise be obtained.” The requesting party indicated that they did not agree with the proposal, as it did not take into account the family’s background; it allegedly demonstrated the State’s negligence in the security of the proposed beneficiaries against extortion; and it was intended to use them as a decoy for the capture of some members of the Gaitanista Self-Defense Forces of Colombia.

9. Likewise, in addition to the Office of the Attorney General and the GAULA, a complaint was filed with the National Agency for Legal Defense of the State (ANDJE) and the National Protection Unit (UNP). The National Army reportedly held informal meetings with the proposed beneficiaries, in which they allegedly indicated that they should not request protection actions or the presence of the National Army in the area, because “it can damage the intelligence work and they do not have the function of making a presence in the areas.” For its part, on February 23, 2024, the ANDJE held a meeting with the proposed beneficiaries, committing to coordinate the National Police and the National Army. The requesting party evaluates that this commitment has not been fulfilled.

10. As for the protection measures, the proposed beneficiaries expressed that they had provided the documentation required by the UNP, highlighting the work carried out by Antonio Miguel Rivera Escolar and Lenin Ernesto Rivera Escolar, as human rights defenders, as well as their search for justice for the murder

of their father. On February 28, 2024, the UNP denied protection measures. This purportedly considered that it is not the competent entity to respond to the situation of the proposed beneficiaries. On April 7, 2024, the UNP sent the request to the Barranquilla Metropolitan Police to take “preventive and proactive” measures. The UNP also allegedly activated the Office of the Attorney General, the Anti-Kidnapping and Anti-Extortion Director of the National Police, and the GAULA. Faced with the decision to reject the protection measures, the requesting party insisted on their granting before the UNP on April 9, 2024.

11. In its report of June 2024, the requesting party indicated that it continued to follow up on the request for protection measures, as well as allegedly sought the Prosecutor’s Office to “prepare an action plan,” but without obtaining answers. On August 9, 2024, the Director of the UNP decided to activate an emergency procedure in favor of the proposed beneficiaries “due to the imminence of the risk,” granting them provisional protection measures. These would remain in force until the conclusion of the risk analysis of the Rivera Escolar brothers. The requesting party requested the Ministry of Defense to install checkpoints in the Zapayán region. The applicant added that two Security Councils had been held to address this issue and a new meeting with ANDJE on August 12, 2024, in which it was required to evaluate the feasibility of carrying out periodic rounds on the boundaries of the property and at the entrance to the Rivera Escolar family’s farm. Similarly, the applicant expressed concern at the lack of investigation into the reported facts.

12. Subsequently, on October 21, 2024, the requesting party reported that on October 15, 2024, the UNP notified the result of the risk assessment of the situation of Antonio Miguel Rivera Escolar and Lenin Ernesto Rivera Escolar, concluding that they were at an “ordinary” risk. Consequently, his protection detail was finalized. The requesting party argued that the evaluation carried out by the State did not take into consideration that the proposed beneficiaries are victims of the internal conflict and that they have been seeking justice for Case 12,881 before the Commission.

13. Lastly, the requesting party stressed that every month, on the 12th, members of paramilitary groups would collect payments from the proposed beneficiaries. Between October 19 and 20, 2024, Mr. Lenin Ernesto Rivera Escolar received threats via text messages from a person who claims to be a member of the Gaitanista Self-Defense Forces of Colombia due to the lack of payment. The content of such messages included: “Dog sob wont you answer. Beware of the consequences sob” [sic], as well as, “We need whats ours who do you and your sob brother think you are,” “Answer *gonorra* expect the worst sob” [sic]. Moreover, the proposed beneficiary received 36 calls from unknown numbers between those days. On October 21, 2024, the proposed beneficiary filed complaints about such events.

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

14. In a report dated June 7, 2024, the State confirmed that the investigation into the crime of extortion in which the proposed beneficiaries are listed as victims is still active. The State stressed that there is no investigation related to the crime of threats.

15. On August 12, 2024, the State indicated that the National Police confirmed receiving information about the facts alleged by the proposed beneficiaries through the UNP, having designated a Judicial Police patrol for corresponding advice. Furthermore, the Police affirmed that recommendations were shared with the proposed beneficiaries to minimize risks against kidnapping and extortion, and required the relevant municipal administration to hold an Extraordinary Security Council. The State noted that the proposed beneficiaries and their families ceased to live on the “Doña Bertha” farm due to security reasons.

16. On October 17, 2024, the State sent a copy of the communication of October 15, 2024, from the Municipal Mayor’s Office of Pedregal, through which it requests the UNP to respond to the situation of the proposed beneficiaries “because what is at stake is the integrity and life of some fellow citizens.” In the same document, reference is made to official notes to the police forces in which more police officers in the

Municipality are requested, indicating an increase in extortion. The State also affirms that, through its Ministry of Foreign Affairs, it will urge the UNP to provide a substantive response to the request of the Municipal Mayor's Office of Pedregal.

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

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

18. The Inter-American Commission and the Inter-American Court of Human Rights (hereinafter "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>2</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.<sup>3</sup> To do this, the IACHR shall assess the problem raised, the effectiveness of State actions to address the situation, and how vulnerable the proposed beneficiaries would be left in case the measures are not adopted.<sup>4</sup> As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits, and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect (*effet utile*) of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.<sup>5</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>2</sup>I/A Court H.R., [Matter of the Yare I and Yare II Capital Region Penitentiary Center \(Yare Prison\)](#), 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>3</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.

<sup>4</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>5</sup>I/A Court H.R., [Matter of the 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.

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

19. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt; rather, the information provided should be assessed from a *prima facie* standard of review to determine whether a serious and urgent situation exists.<sup>6</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 appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.<sup>7</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 its Rules of Procedure, which can be resolved without making any determination on the merits.<sup>8</sup>

20. On another note, the IACHR recalls that, according to Article 25(6) of the Rules of Procedure, the Commission “shall take into account the context” in which a request is framed. In this regard, the Commission has considered that the assessment of the context in which the facts occur informs, illustrates, or guides the verification of the requirements of Article 25 of the Rules of Procedure. In this sense, the IACHR notes that in the Preliminary Observations of the *On-site* Visit to Colombia, held from April 15 to 19, 2024, it observed the expansion of armed groups in the country, which have strengthened their positions in order to control territories and illicit economies, including kidnapping and extortion. As a consequence, “[t]his reconfiguration of the armed conflict has resulted in an alarming number of murders, threats, and acts of harassment and stigmatization, particularly against human rights defenders, social and community leaders, signatories of the Peace Accord, and journalists.”<sup>9</sup> Specifically with regard to persons seeking justice for the victims of the armed conflict in Colombia, the United Nations Special Rapporteur on the situation of human rights defenders expressed concern at the high risk they face<sup>10</sup>.

21. In addition, the Commission notes that this request is connected to Case 12,881, pending before this instance. In that petition, the proposed beneficiaries Antonio Miguel Rivera Escobar and Lenin Ernesto Rivera Escobar appear as victims, and seek justice for the murder of their father Antonio María Rivera Movilla and the alleged lack of a proper investigation. In analyzing the admissibility of the petition, the Commission took into account the allegations that, prior to the events that culminated in his death, Mr. Rivera Movilla “was being extorted” through certain “economic demands” allegedly demanded by paramilitaries who were present in the area.<sup>11</sup> After his death, alleged paramilitaries purportedly went to three farms owned by the reported victim and proceeded to take “all the livestock, tractors and other goods” and allegedly threatened the workers who were present.<sup>12</sup>

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<sup>6</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; [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>7</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 Measures No. 96-21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

<sup>8</sup> In this regard, the Court has indicated 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.” See in this regard: 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.

<sup>9</sup> IACHR, [Preliminary Observations of the On-site Visit to Colombia](#), April 15-19, 2024, p. 3.

<sup>10</sup> UN, [The United Nations Special Rapporteur on the Situation of Human Rights Defenders Michel Forst](#), Visit to Colombia, November 20 to December 3, 2018, End of Mission Statement, p. 28.

<sup>11</sup> IACHR, [Report No. 82/12](#), Petition 615-04, Admissibility Antonio María Rivera Movilla et al. (Colombia), November 8, 2012, para. 9.

<sup>12</sup> [Report No. 82/12](#), previously cited, para. 11.



22. In view of the foregoing, when analyzing the requirement of *seriousness*, the IACHR observes that, since January 24, 2024, the proposed beneficiaries have been receiving threats related to the collection of monetary amounts by persons identified as members of illegal armed groups. Such extortion is said to be connected to the productive activities on the farms that belonged to Antonio María Rivera Movilla, father of the proposed beneficiaries, located in the municipality of Zapayan, Department of Magdalena. According to the requesting party, the proposed beneficiaries were sought again by members of armed groups of the Gaitanista Self-Defense Forces of Colombia at least on February 2 and 9, 2024, and subsequently, each 12th day of the month. The Commission also notes that, according to the allegations presented, the failure to pay in full leads to threats by the armed groups. In this line, on October 19 and 20, 2024, the proposed beneficiary Lenin Ernesto Rivera Escolar received new threats by text message.

23. In this regard, the Commission emphasizes that the events of extortion and threats that the proposed beneficiaries are allegedly facing, perpetrated by armed groups, are consistent with the current context of Colombia monitored by the IACHR during its *on-site* visit in April 2024.<sup>13</sup> As indicated, such events may be related to the occurrence of irreparable harm, such as murders, constituting relevant indications of risk.

24. Particularly regarding the situation of the Rivera Escolar brothers, the IACHR notes that they reported repeated incidents of extortion and threats from armed groups, which have not ceased until now. In the Commission's consideration, this is aggravated by the fact that the proposed beneficiaries identify themselves as human rights defenders and seek justice for the murder of their father. Because of this, and in line with the findings on persons seeking justice for the victims of the armed conflict in Colombia by the United Nations Special Rapporteur on the situation of human rights defenders, the proposed beneficiaries are potentially exposed to greater visibility and a consequent increase in risk<sup>14</sup>. In fact, the Commission recalls that the murder of Mr. Antonio María Rivera Movilla is said to have taken place in a context similar to the current one, characterized by payments demanded by illegal armed groups in the Department of Magdalena.

25. In the scenario indicated, the Commission assesses that the State held meetings with the proposed beneficiaries and the requesting party through the National Agency for Legal Defense of the State (ANDJE), the National Protection Unit (UNP), and the National Army, holding an Extraordinary Security Council. The IACHR also notes that the UNP deployed temporary protection measures in favor of the proposed beneficiaries while carrying out a risk analysis and that the National Police gave them recommendations to minimize risks against kidnapping and extortion. In this regard, while the IACHR positively assesses such initiatives, it understands that they are not sufficient to mitigate the alleged situation, since the proposed beneficiaries continue to be extorted and receive threats.

26. With respect to the State's proposal to carry out the "controlled delivery of the extortion money," the IACHR takes note of the applicant's argument about its inadequacy in the face of the potential exposure of the proposed beneficiaries to an expanded risk, as well as the lack of knowledge of the family's background. In this regard, the Commission recalls that for the protection measures to be adequate and effective, they must be, respectively, suitable to protect the person who in a situation presenting a risk, and produce the expected results in such a way that the risk to the person being protected ceases.<sup>15</sup> The suitability criterion requires that the measures address the risk while allowing a human rights defender to continue with their defense activities.<sup>16</sup> In particular, the Commission observes that the Rivera Escolar brothers continue to seek justice for the murder of their father, without the information submitted by the State allowing the

<sup>13</sup> IACHR, [Preliminary Observations of the On-site Visit to Colombia](#), April 15-19, 2024, p. 3.

<sup>14</sup> UN, [The United Nations Special Rapporteur on the Situation of Human Rights Defenders Michel Forst](#), Visit to Colombia, November 20 to December 3, 2018, End of Mission Statement, p. 28.

<sup>15</sup> IACHR, [Second Report on the Situation of Human Rights Defenders in the Americas](#), OEA/Ser.L/V/II. December 31, 2011, para. 521.

<sup>16</sup> IACHR, [Second Report on the Situation of Human Rights Defenders in the Americas](#), OEA/Ser.L/V/II. December 31, 2011, para. 522.

conclusion that these aspects were considered when assessing their risk. It is also not clear how the actions implemented to date address the various allegations of extortion reported. In this vein, the IACHR draws attention to the fact that different national institutions have called for the implementation of protection measures in favor of the proposed beneficiaries, proposing spaces for consultation with the Army and the National Police, sending information and requests to the Metropolitan Police of Barranquilla to take “preventive and proactive” measures, as well as to the National Protection Unit. However, such proceedings reportedly did not translate into concrete security measures.

27. On another note, the IACHR recognizes the beginning of the investigation into the complaint of extortion. However, it notes that this has not resulted in the identification of those responsible, arrests, or the initiation of criminal proceedings that imply risk mitigation. In light of the allegations presented by the parties, the Commission specifies that it is not up to it, at this time, to detail the concrete measures that should be implemented for the protection of the proposed beneficiaries. In order to define the most appropriate measures, the Commission considers it important to update the risk assessment in light of the work carried out to defend human rights and seek justice. Furthermore, the pertinent measures should be evaluated so that they can continue to carry out such work in safe conditions. This assessment is necessary given that, in light of the information available, the measures adopted to date have not mitigated the events that have continued throughout the year.<sup>17</sup>

28. In view of the foregoing and considering the absence of information from the State that allows to disprove the alleged scenario of lack of protection of the rights to life and personal integrity of Mr. Antonio Miguel Rivera Escolar and Mr. Lenin Ernesto Rivera Escolar, the Commission evaluates that, from the applicable *prima facie* standard, they are at serious risk.

29. As for the *urgency* requirement, the Commission considers that it is met in light of the continuity of the threatening events over time, which suggests that new threats and acts of intimidation and violence could materialize at any time. The foregoing, taking into account that the proposed beneficiaries continue to carry out the work of human rights defense and search for justice for the murder of their father, under the processing of Case 12,881.

30. As it pertains to the requirement of *irreparable harm*, the Commission finds it met, since the possible impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

#### **IV. BENEFICIARIES**

31. The Commission declares as beneficiaries Antonio Miguel Rivera Escolar and Lenin Ernesto Rivera Escolar, who are duly identified in this proceeding.

#### **V. DECISION**

32. The IACHR considers that this matter meets *prima facie* the requirements of seriousness, urgency, and irreparable harm set forth in Article 25 of its Rules of Procedure. Consequently, it requires that Colombia:

- a. adopt the necessary measures to protect the rights to life and personal integrity of Antonio Miguel Rivera Escolar and Lenin Ernesto Rivera Escolar;
- b. implement the corresponding actions so that the beneficiaries can continue their work of defense of human rights and search for justice in relation to the murder of their father;

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<sup>17</sup> IACHR, [Resolution 33/24](#), PM-1036-23 - Víctor Miguel Ángel Moreno Campaña, Colombia, para. 27.

- c. consult and agree upon the measures to be adopted with the beneficiaries and their representation; and
- d. report on the actions taken to investigate the alleged facts that led to this precautionary measure, so as to prevent them from reoccurring.

33. The Commission also requests that Colombia report, within 15 days from the date of notification of this resolution, on the adoption of the requested precautionary measures and update that information periodically.

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

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

36. Approved on December 9, 2024, by Roberta Clarke, President; José Luis Caballero Ochoa, Second Vice-President; Arif Bulkan; Andrea Pochak; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi  
Executive Secretary