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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 108/2021**

Precautionary Measure No. 336-14  
Gener Jhonathan Echeverry Ceballos and family regarding Colombia  
December 27, 2021  
Original: Spanish

**I. SUMMARY**

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of Gener Jhonathan Echeverry Ceballos and his family, in Colombia. At the time of making its decision, the Commission assessed the actions taken by the State during implementation, as well as the observations made by the beneficiaries' representation. Following the requests made by the State to have the measures lifted, the IACHR repeatedly requested observations from the representation, who sent the last response on September 30, 2015, and without responding to the requests for information made in 2015, 2016, 2017, 2019 and 2021. Upon not identifying compliance with the procedural requirements, the IACHR decided to lift these measures.

**II. BACKGROUND INFORMATION**

2. On October 21, 2014, the IACHR requested the adoption of precautionary measures for Gener Jhonathan Echeverry Ceballos, in Colombia. The representation was exercised by the beneficiary himself. The request alleged that the beneficiaries were at risk after having been subjected to threats and acts of violence by "illegal armed groups" due to his activities as a human rights defender and journalist. Upon analyzing the submissions of fact and law presented by the parties, the Commission considered that the information presented showed *prima facie* that there existed a serious and urgent situation. Consequently, in accordance with Article 25 of its Rules of Procedure, the Commission requested that the State: a) adopt the necessary measures to safeguard the life and personal integrity of Gener Jhonathan Echeverry Ceballos and his nuclear family; b) adopt the necessary measures to guarantee that G.J.E.C. can carry out his activities as a human rights defender and journalist, without being subjected to acts of violence and harassment for the exercise of his duties; c) consult and agree upon the measures to be adopted with the beneficiaries; and d) report on the actions taken to investigate the events that led to the adoption of the precautionary measures, so as to prevent such events from reoccurring.<sup>1</sup>

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

3. Throughout the time the precautionary measures have been in force, the Commission has followed-up on the situation that is the subject matter of this resolution through the request for information from the parties. On October 31 and November 10, 2014, the representation presented a report. On November 11, 2014, the State submitted a report and requested that the precautionary measures be lifted. On November 14, 2014, the representation presented a report. On November 18, 2014, the Commission made the corresponding forwarding of information. On November 19, 20 and 25, 2014, the representation presented a report. On December 9, 2014, the Commission requested updated information from the State. On December 9, 11, and 24, 2014, and January 6 and 8, 2015, the representation submitted information.

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<sup>1</sup> IACHR. Resolution 31/2014, Precautionary Measure No. 336-14. Gener Jhonathan Echeverry Ceballos and family regarding the Republic of Colombia. October 21, 2014. <https://www.oas.org/es/cidh/decisiones/pdf/2014/mc336-14-es.pdf>

4. On January 13, 2015, the State sent information. On March 3 and 13, 2015, the beneficiary submitted a report. On March 18, 2015, the State presented a report. On March 26, 2015, the Commission made the necessary forwarding of information. On April 6, 2015, the beneficiary submitted information, as well as on April 28. On May 13, 2015, the Commission made the necessary forwarding of information. On May 26 and July 10, 2015, the State presented a report. On July 28, 2015, the Commission asked the representation to present updated information. On September 12, 2013, the State presented a report. On September 30, 2015, the representation presented updated information. On December 1, 2015, the Commission made the necessary forwarding of information. On December 15, 2015, the State presented a report. On April 13, 2016, the Commission forwarded the report to the representation.

5. On January 4, 2017, the State submitted a report. On April 1, 2017, the Commission forwarded it to the representation. On August 6, 2018, the State presented a report. On January 17, 2019, the Commission requested updated information from the representation. On September 11, 2020, the State requested the lifting of the precautionary measures. The State reiterated the request on December 4, 2020. On January 12, 2021, the Commission requested observations from the representation. Again, on March 3 and June 17, 2021, the State requested to have these measures lifted. Similarly, it reiterated its request on June 17, September 27, and December 7, 2021.

#### **A. Information provided by the State**

6. On November 11, 2014, the State informed: (i) the National Protection Unit (UNP) conducted risk assessments and implemented material protection measures in favor of the beneficiary; (ii) after the October 1 attack, the Director of the UNP ordered the adoption of the following provisional protection measures: an armored vehicle, a protection man, a bulletproof vest, and a communication device; (iii) on October 6, the beneficiary told the Delegate Prosecutor's Office [*Procuraduría Delegada*] that the assigned security measures had not been implemented by the UNP; (iv) on October 7, the beneficiary reported that the Unit had sent him a new vehicle in better condition; (v) on October 10, following a meeting of the Committee for Risk Assessment and Recommendation of Measures (CERREM), the beneficiary informed that an additional man had been authorized, remaining with two protection men, and additionally, he was purportedly authorized an armored car and a liaison to make progress in the processing of *per diem* due to his displacements, measures that would be implemented as of the following month; (vi) the National Police reported that as of January 17, 2013, the Antioquia Police Department intensified preventive protection measures in favor of the beneficiary; (vii) when the beneficiary travels to the municipality of Concordia, the police of the municipality implement rounds and inspections at his workplace and his home; and (viii) regarding the threats against the beneficiary, an investigation is underway.

7. On January 13, 2015, the State confirmed the information provided by the beneficiary regarding the consultation meeting of November 26, 2014. Additionally, it was reported that: (i) the beneficiary was provided with the contact information of the Chief of Human Rights of the Antioquia Department Police; (ii) regarding the events that occurred on August 29, 2014, the National Police stated that it was not a particular event against the beneficiary; (iii) the new commander of the Concordia Police Station asked the beneficiary to report the next time he goes to that territory to coordinate aspects related to his protection in the area, and in relation to the beneficiary's complaints about the Station, they requested that he put these complaints in writing to undertake the relevant internal investigations; and (iv) regarding criminal investigations in which the beneficiary is registered as a victim, it was agreed to study the possibility of an association of cases.

8. On March 18, 2015, the State presented information on the criminal investigations that have the beneficiary as a victim. In this regard, it was reported that: (i) regarding the events that occurred on October 1, 2014, an investigation was carried out for the crime of attempted murder, which is allegedly active and at the investigation stage; (ii) the investigation into the crime of firing a firearm against a vehicle is at the investigation stage; and (iii) three investigations are underway in the Medellín and Antioquia sectional offices for events that occurred on December 15, 2010, December 15, 2013, and July 25, 2014. On May 26, 2015, the State presented a report in which it made a summary of all the actions taken to protect the beneficiary and his nuclear family. In this regard, it states that:

- The first risk analysis of the beneficiary was carried out in November 2013, and in accordance with the recommendations of the Committee for Risk Assessment and Recommendation of Measures (CERREM), measures were implemented on February 25, 2014, which were readjusted on April 24, 2014.
- The beneficiary reportedly requested the readjustment of the measures. The case was brought before CERREM in its session on September 4, 2014, in which it was determined that the result of the risk assessment that was underway due to supervening events would be awaited.
- Following the attack on October 1, 2014, the UNP implemented urgent protection measures: an armored vehicle, a protection man, a bulletproof vest, and a communication device.
- The assigned vehicle was sent to the city of Medellín on October 3, 2014; however, the beneficiary stated that the vehicle was not suitable to provide the service, and therefore, another vehicle was sent on October 7.
- After the consultation meeting on November 26, 2014, the CERREM resolution of December 18, 2014, was implemented, whereby a type 2 security detail was implemented for the beneficiary, which consisted of transportation support for an amount of 3 current legal monthly minimum wages (SMLMV) and a protection man.
- Regarding the beneficiary's complaints about the non-payment of tolls, the UNP reported that it prepared the necessary forms to authorize the payments.
- Regarding the authorization of *per diem* in favor of the beneficiary's security officers, the UNP informs that the *per diem* request must be made 48 hours in advance and in special formats. Moreover, the Unit reported that in case the request for *per diem* is denied, the beneficiary's security detail can communicate with the local authorities of the territory to which the beneficiary is going to travel so that they can have security coverage.
- Regarding the size of the bulletproof vest, the UNP informs that the beneficiary must contact the Implementation Group of the National Protection Unit, informing the size of the vest he needs.
- The Ministry of National Defense reported that the Fourth Brigade of the National Army, the Military Police Battalion No. 4, as well as the National Police, carry out activities to maintain public order in the area where the attempt on the beneficiary's life occurred on October 1, 2014. These actions include detentions against members of "illegal groups."
- The criminal investigations that have the beneficiary as a victim are still at the investigation stage. By official letter dated March 20, 2015, the Office of the Attorney General of the Nation considered that it was inappropriate to associate the processes.

9. On July 10, 2015, the State reiterated the information presented on May 26, 2015. On September 28, 2015, the State indicated that: (i) the investigation into the events that occurred on October 1, 2014, is under procedural activity with a view to establishing the true occurrence of the event, as well as the identification of the alleged perpetrator(s) of the crime; and (ii) there is no information in the SPOA Information System about an investigation into the alleged constraint of the beneficiary's security officer to change his statement. The matter was, then, brought to the attention of the Sectional Directorate of Prosecutor's Offices of Medellín in order to carry out the corresponding investigations. On December 15,

2015, the State reported that: (i) the beneficiary had already informed the State of the events that occurred on September 30, 2015, for which the UNP reported that the Coordination of the Group of Requests for Protection sent the facts to the competent area so that the situation can be analyzed and the pertinent steps taken; and (ii) there is an investigation in which the beneficiary is accused of the crime of “homogeneous concurrence of homicides of a protected person in heterogeneous concurrence with the crime of aggravated conspiracy to commit a crime” for events dating to the year 2000. According to a resolution of November 5, 2015, the beneficiary was captured, and a pretrial detention measure was ordered.

10. On January 4, 2017, the State presented a report stating that: (i) the criminal investigations, both those that present the beneficiary as a victim and those that present the beneficiary as an accused, remain active. The investigation carried out by the specialized Prosecutor’s Office 5 of Medellín against the beneficiary is at the investigation stage, within the framework of this investigation the beneficiary was purportedly captured and a pretrial detention measure was imposed, therefore on July 20, 2016, the beneficiary reportedly requested his release due to expiration of terms, a request that was denied on July 23, 2016; and (ii) on January 13, 2016, the National Protection Unit withdrew the protection detail that had been granted in favor of the beneficiary due to the imposition of the measures of assurance against the beneficiary.

11. On August 6, 2018, the State presented a report in which it stated that on October 25, 2016, the beneficiary was granted provisional release. However, the beneficiary purportedly continues to be linked to the investigation. On September 11, 2020, the State requested the lifting of the precautionary measures. Additionally, they reported that on March 18, 2019, the Metropolitan Police of Valle de Aburra (MEVAL) went to the beneficiary’s home, the security guard informed them that the beneficiary had not lived in the place for four years. The MEVAL commander then sent a communication to the beneficiary’s email, without obtaining a response.

12. Finally, between 2020 and 2021, the State reiterated its request to have these precautionary measures lifted.

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

13. On October 31, 2014, the representation stated that he did not receive any communication from the State regarding the implementation of the precautionary measures. However, he indicated that he was granted an armored car that has mechanical problems, and therefore, he avoids using the vehicle. The beneficiary allegedly requested the change of vehicle or the repair of the breakdowns and received no response. Additionally, he affirms that his only security escort requested a support weapon to improve security given that he does not have any issued weapon because the Prosecutor’s Office should carry out a ballistic test following the October 1 attack. In addition, he is said to have a vest that is too small for him, and they purportedly assigned him a communication device that he does not have at present because was stolen three months ago. The beneficiary reported that: (i) his family unit has not received any security measures from the UNP; (ii) his security escort fulfills both the role of security escort and driver; (iii) they did not give him security guarantees and he is not allowed to go more than 100 km from his residence; (iv) his personal vehicle was damaged in the attempt on his life and has not been repaired by the UNP; and (v) his security situation has deteriorated and, in addition, they owe him a month of transportation allowance. On November 10, 2014, the representation reiterated the information previously presented, additionally reporting that: (i) his security escort told him that he must organize his work schedule because they only authorized 10 hours of service; (ii) he requests a mechanical technical review of the vehicle assigned to him, because according to the UNP, the vehicle is in perfect condition but the reality is

completely different; (iii) he has no fuel to travel and is owed 1,232,000 COP for the transportation subsidy payment.

14. On November 14, 2014, the beneficiary stated that they authorize him to travel more than 100km away from his residence with his security escort. On November 19, 2014, the beneficiary stated that a diagnosis had been carried out on the armored vehicle, which confirmed technical failures. The beneficiary then requested the change of the vehicle because he had distrust of the possible repairs and that the vehicle can provide true security. On November 20, 2014, the beneficiary stated the need to keep the precautionary measures in force. On November 25, 2014, the beneficiary stated that on November 22 he was given a vehicle that had faults such as an oil leak in the engine and hydraulic steering problems, for which he was forced to cancel his travel schedule. On December 9, 2014, the beneficiary stated that he still had problems with the assigned vehicle. On December 11, 2014, the beneficiary reported that a consultation meeting was held on November 26, in which it was agreed: (i) that the assigned security escort is not changed and the new security escorts to be assigned were people who had worked with the beneficiary; (ii) prepare a resolution of material protection measures that include an armored vehicle, three security escorts –two for the beneficiary and one for his family unit– and transportation support in the amount of 3 SMLMV for the beneficiary’s wife; (iii) process the beneficiary’s travel requests for events that exceed 100 km; (iv) five days of *per diem* per month for the security escorts of the beneficiary’s security detail; and (v) conducting a security study of the beneficiaries’ homes in January. On December 24, 2014, the beneficiary again expressed his dissatisfaction with the lack of implementation of the precautionary measures, as well as on January 6, 2015.

15. On March 3, 2015, the beneficiary stated that: (i) he has not received support to pay tolls for five months; (ii) they have not paid the necessary *per diem* for the security officers to accompany him on his journeys; (iii) the bulletproof vest assigned to him, which is not his size, has not been changed; (iv) they have not paid the transportation aid that had been promised to the beneficiary’s wife; (v) a visit to the beneficiary’s home has not been carried out to analyze whether or not security measures would be applied; and (vi) one of the security escorts assigned to the beneficiaries’ security detail has a revolver-type firearm even though the protection regulations establish the use of a pistol-type firearm. On March 13, 2015, the beneficiary reported that on March 12, the protection officer assigned to the beneficiary’s wife was withdrawn, as well as the transportation subsidy that had been assigned, even though at the consultation meeting on November 26, 2014, it was established that the measures would be in effect for one year.

16. On April 6, 2015, the representation attached an affidavit from the security agent accompanying him on October 1, 2014, when an attack was carried out against the beneficiary. The agent stated that he was summoned on March 12, 2015, to the UNP where they informed him that they were going to withdraw him from the beneficiary’s security detail. Later, they informed him that what happened with the beneficiary had been a self-attack since the ballistics report shows that the three shots made by the agent were from the outside in. On April 28, the beneficiary expressed dissatisfaction with the way in which the precautionary measures are implemented. Additionally, the beneficiary reported that they had to change address.

17. On September 30, 2015, the beneficiary reported that that day he was driving with his security detail in the armored van, on a road in the municipality of Itagüí, when they were boarded by four motorcycles with subjects carrying firearms and one of them hit the right rear window. It was indicated that the beneficiary’s security escort reacted, drawing his issued weapon. No further details were provided.



18. The Commission requested information from the representation in December 2015, April 2016, April 2017, January 2019, and January 2021. After all the timelines granted have expired, no response has been received from him.

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

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

20. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have repeatedly established 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 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 described, and the vulnerability to which the persons proposed as beneficiaries would be exposed if the measures are not adopted.<sup>4</sup> Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under consideration by the organs of the inter-American system. The precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations. In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

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

<sup>2</sup> See in this regard: I/A Court H.R. [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#). Request for Provisional Measures submitted by the IACHR regarding the Bolivarian Republic of Venezuela, Order of the Inter-American Court of Human Rights of March 30, 2006, considerandum 5; I/A Court H.R. [Case of Carpio Nicolle et al. v. Guatemala](#). Precautionary Measures, Order of July 6, 2009, considerandum 16.

<sup>3</sup> See in this regard: I/A Court H.R. [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#). Provisional Measures regarding Venezuela, Order of the Court of February 8, 2008, considerandum 8; I/A Court H.R. [Case of Bámaca Velásquez](#). Provisional measures regarding Guatemala, Order of the Court of January 27, 2009, Considerandum 45; I/A Court H.R. [Matter of Fernández Ortega et al.](#) Provisional Measures regarding Mexico, Order of the Court of April 30, 2009, considerandum 5; I/A Court H.R. [Matter of Milagro Sala](#). Request for Provisional Measures regarding Argentina, Order of the Inter-American Court of Human Rights of November 23, 2017, considerandum 5.

<sup>4</sup> See in this regard: I/A Court H.R. [Matter of Milagro Sala](#). Request for Provisional Measures regarding Argentina, Order of the Inter-American Court of Human Rights of November 23, 2017, considerandum 5; I/A Court H.R. [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#). Provisional Measures regarding Venezuela, Order of the Court of February 8, 2008, considerandum 9; I/A Court H.R. [Matter of the Criminal Institute of Plácido de Sá Carvalho](#). Provisional Measures regarding Brazil, Order of the Inter-American Court of Human Rights of February 13, 2017, considerandum 6 [only in Spanish].

21. With respect to the foregoing, Article 25(7) of the Commission’s Rules of Procedure establishes that “the decisions granting, extending, modifying or lifting precautionary measures shall be adopted through reasoned resolutions.” Article 25(9) establishes 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 should assess if the serious and urgent situation and possible irreparable harm that caused the adoption of the precautionary measures persist. Moreover, the Commission shall consider whether new situations have subsequently arisen that might meet the requirements set forth in Article 25 of the Rules of Procedure.

22. Similarly, while the assessment of the procedural requirements when adopting precautionary measures is carried out from a *prima facie* standard, keeping such measures in force requires a more rigorous evaluation.<sup>5</sup> In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.<sup>6</sup> The Inter-American Court has indicated that the passage of a reasonable period of time without any threats or intimidation, added to the lack of imminent risk, may lead to the lifting of international protection measures.<sup>7</sup>

23. In this matter, the Commission recalls that the precautionary measures were granted in 2014 in light of the information provided by the parties. The Commission granted the measures in favor of Gener Jhonathan Echeverry Ceballos and his family. It was assessed that the beneficiaries were at risk under the terms of Article 25 of the Commission’s Rules of Procedure, since the beneficiary had been reportedly the target of threats and acts of violence by “illegal armed groups” due to his activities as a human rights defender and journalist. During the Commission’s follow-up, the State submitted reports, responding to the Commission’s requests. Thus, the Commission observes that the State referred to the following measures:

- (i) Risk assessments in the terms informed in the file;
- (ii) Implementation of material protection measures in favor of the beneficiary and his family, consisting of a security detail, an armored vehicle, a bulletproof vest, transportation subsidies, etc.;
- (iii) Adjustments to the protection details implemented over time;
- (iv) Consultation meetings, such as the one on November 26, 2014;
- (v) Responses to the various requests and questions made by the representation; and
- (vi) Corresponding investigations for alleged events, as well as reporting their progress.

24. Although the representation questioned the way in which the precautionary measures were implemented, he did not deny that these existed or provided information on the ongoing and “imminent” threatening events against him. The single most recent alleged event dates to September 2015. Furthermore, in the claim, the Commission observes that the protection detail was activated for his protection, without providing further details on the part of the representation. In addition to this, the Commission notes that the State has requested the lifting of these precautionary measures on at least seven occasions: November 2014, September and December 2020, and March, June, September and December 2021. In the terms of Article 25(9) of the Rules of Procedure, the request for the lifting of the measures was forwarded to the representation.

<sup>5</sup> I/A Court H.R., Provisional Measures regarding Mexico, Order of February 7, 2017, paras. 16 and 17. Available [in Spanish] at [http://www.corteidh.or.cr/docs/medidas/fernandez\\_se\\_08.pdf](http://www.corteidh.or.cr/docs/medidas/fernandez_se_08.pdf)

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

25. In this regard, as for the representation, the Commission observes that, despite requests for information made in 2015, 2016, 2017, 2019 and 2021, his response is not available. In this sense, the Commission observes that approximately six years have gone by without any kind of communication from the representation in the framework of this proceeding. The foregoing consideration is relevant given that the lifting of these precautionary measures has been requested. Thus, the Commission recalls that when a State requests the lifting of a precautionary measure, it must present sufficient evidence and arguments to support its request.<sup>8</sup> By the same token, the representatives of the beneficiaries that want the measures to continue must present evidence of any reasons why.<sup>9</sup> Similarly, Article 25(11) of the Rules of Procedure sets forth that the Commission may lift or review a precautionary measure when the beneficiaries or their representatives unjustifiably fail to provide the Commission with a satisfactory response to the requests made by the State for its implementation.

26. In this sense, the Commission does not have recent, up-to-date, and concrete information that is sufficient to conclude that the situation meets the requirements of Article 25 of the Commission's Rules of Procedure. It is also noted that the State itself has sought to contact the beneficiary in 2019, after having been released on bail, looking for him at his home or sending him a communication, without obtaining any response.

27. Consequently, and considering the analysis previously carried out, and in response to the request to lift the measures made by the State, the Commission understands that the factual circumstances that motivated the granting of these precautionary measures have changed significantly due to the measures taken in favor of the beneficiary and the lack of information provided by the representation. Thus, the Commission deems that it is not possible to identify any situation that currently fulfills the requirements of Article 25 of the Rules of Procedure. In view of the above, and taking into account the exceptional and temporary nature of precautionary measures,<sup>10</sup> the Commission deems it appropriate to lift these measures.

28. Lastly, the Commission emphasizes that regardless of the lifting of these measures, in accordance with Article 1(1) of the American Convention, it is the obligation of the State of Colombia to respect and guarantee the rights recognized therein, including the life and personal integrity of the persons identified in the matter at hand.

## **V. DECISION**

29. The Commission decides to lift the precautionary measures granted in favor of Gener Jhonathan Echeverry Ceballos and his family, in Colombia.

30. The Commission recalls that the lifting of these measures does not prevent the representation from filing a new request for precautionary measures in case they consider that there exists a situation that meets the requirements established in Article 25 of the Rules of Procedure.

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

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<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> I/A Court H.R., Matter of Adrián Meléndez Quijano *et al.* Provisional Measures regarding El Salvador. Order of the Court of August 21, 2013, para. 22, and Matter of Galdámez Álvarez *et al.* Provisional Measures regarding Honduras. Order of the Inter-American Court of Human Rights of November 23, 2016, para. 24



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32. Approved on December 27, 2021, by Antonia Urrejola Noguera, President; Julissa Mantilla Falcón, First Vice-President; Flávia Piovesan, Second Vice-President; Margarete May Macaulay; Esmeralda Arosemena de Troitiño; Joel Hernández García; and Edgard Stuardo Ralón Orellana, members of the IACHR.

Tania Reneaum Panszi  
Executive Secretary