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**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUCIÓN 33/2025**

Precautionary Measure No. 252-25  
Douglas Gamaliel Pérez Centeno regarding Nicaragua  
April 6, 2025  
Original: Spanish

**I. INTRODUCTION**

1. On March 7, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission”, “the Commission” or “the IACHR”) received a request for precautionary measures urging the Commission to require that the State of Nicaragua (“the State” or “Nicaragua”) adopt the necessary measures to protect the rights to life and personal integrity of Douglas Gamaliel Pérez Centeno (“the proposed beneficiary”). According to the request, following his extradition from Costa Rica, Nicaraguan state authorities detained the proposed beneficiary on February 16, 2025, and he has been deprived of his liberty since. As a result, his family members have no official information about his whereabouts, detention conditions, or current situation in Nicaragua.

2. In accordance with Article 25(5) of the Rules of Procedure, the IACHR requested information from the State on March 27, 2025. To date, the State has not replied to the Commission and the granted deadline has expired.

3. Upon analyzing the submissions of fact and law furnished by the applicant, the Commission considers that the information presented shows *prima facie* that the proposed beneficiary is in a serious and urgent situation, given that his rights to life, and personal integrity are at risk of irreparable harm. Accordingly, Nicaragua is requested to: a) adopt the necessary measures to protect his rights to life and personal integrity. In particular, clarifying where he is being held in Nicaragua or his legal situation following his extradition to the country; b) specify whether, since his extradition from Costa Rica, he has been brought before the appropriate judicial authority, and if not, indicate the reasons for his detention without judicial review. Likewise, to report on his conditions of deprivation of liberty, including the procedural stage of the criminal case against him, and whether he has access to his legal representatives and family members, as well as the necessary health care; and c) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent them from reoccurring.

**II. BACKGROUND INFORMATION**

4. Following the beginning of the crisis of the human rights situation in Nicaragua and the working visit carried out in May 2018, the Commission formed the Special Follow-up Mechanism for Nicaragua (MESENI) in order to follow up on the recommendations made to the State, as well as to maintain the respective monitoring for the purposes relevant to the mandates of the IACHR.<sup>1</sup> Similarly, the IACHR installed the Interdisciplinary Group of Independent Experts (GIEI) of Nicaragua, which issued a report that analyzed the events that took place in April and May 2018.<sup>2</sup> For its part, the IACHR decided to include Nicaragua in its Annual

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<sup>1</sup> IACHR, Press Release No. 134/48, [IACHR Issues Report on Nicaragua’s Serious Human Rights Situation](#), June 22, 2018; Press Release No. 135/18, [IACHR Launches Special Monitoring Mechanism for Nicaragua \(MESENI\)](#), June 24, 2018; Press Release No. 274/18, [Press Release about Nicaragua](#), December 19, 2018; Press Release No. 113/20, [Two Years After Visit to Nicaragua, IACHR Condemns Lack of Compliance with its Recommendations and Calls on the State to Urgently Implement Them](#), May 16, 2020.

<sup>2</sup> IACHR, Press Release No. 145/18, [IACHR Announces Establishment of Interdisciplinary Group of Independent Experts for Nicaragua](#), July 2, 2018; GIEI, [Report on the events of violence that occurred between April 18 and May 30, 2018](#) December 21, 2018.

Report in Chapter IV.B as of 2018, in accordance with the grounds established in its Rules of Procedure.<sup>3</sup> In parallel, the Commission, under its monitoring mandate, has issued reports on the human rights situation in Nicaragua. These reports include a series of recommendations to the State aimed at ensuring the respect and protection of individuals' rights in accordance with its international obligations.<sup>4</sup>

5. In addition to the above, the Commission has consistently issued statements and included concerns in its annual report, highlighting the escalating crisis and serious human rights violations in the country from multiple perspectives. In addition, the Commission has addressed the persistence of acts of persecution;<sup>5</sup> the intensification of surveillance, harassment, and selective repression against individuals seen as opponents of the government, as well as human rights defenders, and independent journalists.<sup>6</sup> It has also highlighted the widespread impunity and the prolonged breakdown of the rule of law,<sup>7</sup> the criminalization of opposition female and male leaders,<sup>8</sup> the deportation of people deprived of liberty due to political reasons and the loss of nationality,<sup>9</sup> the repressive escalation against members of the Catholic Church,<sup>10</sup> the absence of conditions for free and fair elections,<sup>11</sup> the arbitrary detention of human rights defenders, journalists, and members of the Catholic Church,<sup>12</sup> and the government's repressive strategy to silence critical voices to the government ahead of the 2024 regional elections.<sup>13</sup>

6. Considering the foregoing, the Commission has urged the State of Nicaragua, among other aspects, to comply with its obligations regarding human rights;<sup>14</sup> to implement the recommendations issued

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<sup>3</sup> IACHR, 2018 Annual Report, [Chapter IV.B Nicaragua](#); 2019 Annual Report, [Chapter IV.B Nicaragua](#), February 24, 2020; 2020 Annual Report, [Chapter IV.B Nicaragua](#), February 2, 2021; 2021 Annual Report, [Chapter IV.B Nicaragua](#), May 2022; 2023 Annual Report, [Chapter IV.B Nicaragua](#), December 31, 2023.

<sup>4</sup> IACHR [Report: Closure of Civic Space in Nicaragua](#), OEA/Ser.L/VIII.Doc.212/23, September 23, 2023; [Persons deprived of liberty in Nicaragua in connection with the human rights crisis that began on April 18, 2018](#), OEA/Ser.L/V/II. Doc 285, October 5, 2020; [Report on Forced Migration of Nicaraguans to Costa Rica](#), OEA/Ser.L/V/II. Doc.150, September 7, 2019; [Report on Gross Human Rights Violations in the Context of Social Protests in Nicaragua](#), OEA/Ser.L/V/II. Doc.86, June 21, 2018.

<sup>5</sup> IACHR, Press Release No. 6/19, [IACHR denounces the weakening of the rule of law in the face of serious human rights violations and crimes against humanity in Nicaragua](#), January 10, 2019; January 10, 2019; Press Release No. 90/19, [IACHR Condemns Continuing Acts of Repression in Nicaragua during Negotiating Table Talks](#), April 5, 2019.

<sup>6</sup> IACHR, Press Release No. 80/20, [Two Years into Nicaragua's Human Rights Crisis, the IACHR Stresses its Permanent Commitment to Victims and Confirms the Consolidation of a Fifth Phase of Repression](#), April 18, 2020. Press Release 152/21, [IACHR Condemns the Serious Escalation of Repression in Nicaragua](#), June 18, 2021.

<sup>7</sup> IACHR, Press Release No. 93/21, [Three Years After the Start of the Human Rights Crisis in Nicaragua, IACHR Condemns Ongoing Impunity](#), April 19, 2021.

<sup>8</sup> IACHR, Press Release No. 145/21, [IACHR and OHCHR Categorically Condemn Criminal Prosecution of Presidential Precandidates and Urge State of Nicaragua to Release Them Immediately](#), June 9, 2021; Press Release No. 172/21, [Nicaragua: IACHR and OHCHR Demand an End to Arbitrary Arrests and the Release of All Individuals Detained Since the Start of the Crisis in Nicaragua](#), July 9, 2021. Press Release 238/21, [IACHR and OHCHR Condemn Criminalization, Failure to Enforce Due Process, and Serious Conditions of Detention for Individuals Who are Perceived to Be Government Critics in Nicaragua, September 10, 2021](#); Press Release RD026/22, [REDESCA Condemns the Cancellation of the Membership of 26 Universities and Associations for Academic and Social Purposes by the National Assembly of Nicaragua, February 10, 2022](#).

<sup>9</sup> IACHR, Press Release No. 021/23, [IACHR Welcomes Release of Political Prisoners in Nicaragua and Rejects Arbitrary Deprivation of Nationality](#), February 13, 2023.

<sup>10</sup> IACHR, Press Release No. 184/22, [IACHR condemns acts of repression and the detention of members of the Catholic Church in Nicaragua](#), August 19, 2022.

<sup>11</sup> IACHR, Press Release No. 248/22, [IACHR Warns of the Lack of Appropriate Conditions for Holding Free, Fair Municipal Elections in Nicaragua](#), November 4, 2022.

<sup>12</sup> IACHR, Press Release No. 123/23, [IACHR Rejects Continued Repression and Human Rights Violations in Nicaragua](#), June 16, 2023; Press Release No. 184/23, [Nicaragua: IACHR and OHCHR Urge the State to Release Monsignor Rolando Álvarez and Guarantee his Human Rights](#), August 18, 2023; Press Release No. 218/23, [IACHR Urges the State of Nicaragua to Cease Persecution against the Catholic Church](#), September 15, 2023.

<sup>13</sup> IACHR, Press Release No. 243/23, [IACHR and RELE: Nicaragua must cease repression against indigenous communities of the Caribbean Coast](#), October 10, 2023.

<sup>14</sup> IACHR, Press Release No. 6/19, [IACHR Denounces the Weakening of the Rule of Law in the Face of Grave Human Rights Violations and Crimes against Humanity in Nicaragua](#), January 10, 2019; Press Release No. 26/19, [IACHR Denounces Escalation of Attacks on the Press and Persistence of Human Rights Violations in Nicaragua](#), February 6, 2019; Press Release No. 90/19, [IACHR Condemns Persistence of Acts of Repression in Nicaragua in the Context of the Negotiating Table](#), April 5, 2019.

by the IACHR;<sup>15</sup> to cease acts of persecution against people identified as opponents of the government and to reestablish democratic guarantees;<sup>16</sup> to release individuals that remain arbitrarily detained in inadequate conditions of detention;<sup>17</sup> to reestablish and give effect to the full enjoyment of civil and political rights;<sup>18</sup> and to put an end to the repression and persecution of those who seek the return of democracy in Nicaragua or exercise their public freedoms.<sup>19</sup> More recently, on June 11, 2024, the Commission and its Office of the Special Rapporteur for Freedom of Expression (SRFoE, or RELE for its acronym in Spanish) expressed concern over the dire situation of individuals arbitrarily deprived of their liberty in Nicaragua. They urged that their lives and integrity be guaranteed, and called for their immediate release.<sup>20</sup>

7. The Commission noted that on September 5, 2024, 135 individuals considered opponents of the regime who were arbitrarily detained in Nicaragua under deplorable conditions and allegations of torture and ill-treatment were released and transferred to Guatemala. However, it condemned the arbitrary deprivation of their Nicaraguan nationality and the seizure of their assets. On this matter, the IACHR urged Nicaragua to guarantee the right to nationality, to cease repression in the country and to release all people who continue to be arbitrarily detained.<sup>21</sup>

8. Lastly, the Commission reaffirmed its jurisdiction over Nicaragua and continues to fulfill its monitoring mandates through MESENI, as well as through the analysis and processing of cases, petitions, and precautionary measures.<sup>22</sup> In this regard, the Commission emphasized that the State of Nicaragua continues to be bound by all the international instruments to which it is a party, such as the American Convention on Human Rights.<sup>23</sup>

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

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

9. According to the request, the proposed beneficiary is 45 years old and described himself as a farmer and member of the opposition group Nicaraguan Patriotic Alliance Resistance Southern Front (*Alianza Patriótica Nicaragüense Resistencia Frente Sur*). By way of background, it was reported that he had actively participated in social protests in various areas of Nicaragua, showing support for the country's youth and farmers. In addition, the applicant reported that, after a series of administrative and judicial processes and

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<sup>15</sup> IACHR, Press Release No. 113/20, Two years after its visit to Nicaragua, the IACHR warns and condemns the non-compliance with its recommendations and urgently calls on the State to implement them, May 16, 2020.

<sup>16</sup> IACHR, Press Release No. 249/20, IACHR Calls for the Immediate Cessation of Acts of Persecution against Persons Identified as Opponents of the Government and the Reestablishment of Democratic Guarantees in Nicaragua, October 10, 2020.

<sup>17</sup> IACHR, Press Release No. 145/21, IACHR and OHCHR Categorically Condemn the Criminal Prosecution of Presidential Pre-candidates and Urge the State of Nicaragua to Immediately Release Them, June 9, 2021; Press Release No. 171/21, IACHR and OHCHR Demand an End to Arbitrary Arrests and the Release of All Individuals Detained Since the Start of the Crisis in Nicaragua, June 9, 2021; Press Release No. 197/2022, IACHR and REDESCA: Urge immediate release of political prisoners in deplorable conditions in Nicaragua, September 5, 2022.

<sup>18</sup> IACHR, Press Release R218/22, In light of serious allegations regarding the closure of civic spaces in Nicaragua, UN and IACHR Special Rapporteurs urge authorities to comply with their international obligations to respect and guarantee fundamental freedoms, September 28, 2022.

<sup>19</sup> IACHR, Press Release No.24/2023, IACHR and OHCHR Condemn Escalation of Human Rights Violations in Nicaragua, February 17, 2023.

<sup>20</sup> IACHR, Press Release No.132/2024, Nicaragua: IACHR Urges to Guarantee the Life and Integrity of Persons Arbitrarily Detained and to Immediately Release Them, June 11, 2024.

<sup>21</sup> IACHR, Press Release No. 217/24, IACHR condemns arbitrary revocation of nationality of 135 recently released prisoners in Nicaragua, September 13, 2024.

<sup>22</sup> IACHR, Press Release 312/2021, IACHR Stresses Its Competent Jurisdiction Concerning Nicaragua and laments Nicaragua's Decision to Denounce the Charter of the OAS in a Context of Serious Human Rights Violations, November 20, 2021.

<sup>23</sup> IACHR, Press Release 312/21, previously cited.

appeals, the proposed individual had been extradited from Costa Rica to Nicaragua and handed over to that country on February 16, 2024.

10. Since the proposed beneficiary's extradition to Nicaragua, there has been no official information about his location or physical condition. His current detention conditions are also unknown. The applicant argued that there are obstacles in filing an *habeas corpus* to determine the proposed beneficiary's location, given that attorneys in Nicaragua reportedly refuse to take on this type of petition for fear of reprisals. He described the proposed beneficiary's situation as an "enforced disappearance by concealment."

11. His family members went to La Modelo Penitentiary System in Tipitapa on August 3, 2024, to request information from the prison authorities. At that time, the authorities told them to return the following week. After six attempts to obtain information, the authorities said that they could not see the proposed beneficiary and that they were wasting their time. The applicant indicated that a family member was threatened with being imprisoned themselves if they insisted on wanting to see him.

12. Lastly, the applicant alleged that the proposed beneficiary is reportedly subjected to torture and cruel, inhuman, and degrading treatment. Fanor Alejandro Ramos, who was released from prison and who reportedly saw the proposed beneficiary, gave the following testimony:

*"Through this video I want to bear witness to the situation and the condition of Douglas Gamaliel Pérez Centeno, who is in the cells of maximum security unit 300. In the gallery inappropriately known as "infiernillo", which is the hardest, blackest part of the dictatorship's jails. He is in complete isolation, permanently shackled. Naked. He is not allowed visits, receives torture, constant threats, does not receive any medical attention, the guard constantly manages to put pressure on him to take his picture, they put a uniform on him, they put a mattress on the floor, they take off his shackles to take photos, I don't know for what purpose and then, after they have taken the photo, they take the uniform off him again. They leave him totally naked, and they take the mat. He, like all political prisoners, is not even allowed a mosquito net to protect us from insects. It is a crowded place, full of insects and without medical attention. [...]"*

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

13. The IACHR requested information from the State on March 27, 2025. To date, the representation has not submitted its responses, and the granted timelines have already expired.

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

14. The precautionary measures mechanism is part of the Commission's function of overseeing compliance with the human rights obligations set forth in Article 41(b) of the American Convention on Human Rights, also included in Article 18(b) of the Statute of the IACHR. The precautionary measures mechanism is described in Article 25 of the Rules of Procedure of the Commission. 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 people.

15. 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>24</sup> Regarding the protective nature, these measures seek

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<sup>24</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.

to avoid irreparable harm and protect the exercise of human rights.<sup>25</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>26</sup> Regarding 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>27</sup> In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

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

16. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt; rather, the information provided should be assessed from a *prima facie* standard of review to determine whether a serious and urgent situation exists.<sup>28</sup> Similarly, the Commission recalls that, by its own mandate, it is not 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>29</sup> This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of the Rules of Procedure, which can be resolved without making any determination on the merits.<sup>30</sup>

17. By way of background, the Commission emphasizes that it became aware of the proposed beneficiary’s extradition process from Costa Rica to Nicaragua after analyzing the situation of Reinaldo Picado

<sup>25</sup> I/A Court H.R., Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; Case of Bámaca Velásquez, Provisional measures regarding Guatemala, Order of January 27, 2009, considerandum 45; Matter of Fernández Ortega et al., Provisional measures regarding Mexico, Order of April 30, 2009, considerandum 5; Matter of Milagro Sala, Provisional measures regarding Argentina, Order of November 23, 2017, considerandum 5. (Available only in Spanish)

<sup>26</sup> I/A Court H.R., Matter of Milagro Sala, Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; Matter of the Criminal Institute of Plácido de Sá Carvalho, Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

<sup>27</sup> I/A Court H.R., Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 7; Matter of “El Nacional” and “Así es la Noticia” newspapers, Provisional Measures regarding Venezuela, Order of November 25, 2008, considerandum 23; Matter of Luis Uzcátegui, Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19 (Available only in Spanish).

<sup>28</sup> I/A Court H.R., Matter of Members of the Miskitu Indigenous Peoples of the North Caribbean Coast regarding Nicaragua, Extension of Provisional Measures, Order of August 23, 2018, considerandum 13 (Available only in Spanish); Matter of children and adolescents deprived of liberty in the “Complexo do Tatuapé” of the Fundação CASA, Provisional Measures regarding Brazil, Order of July 4, 2006, considerandum 23.

<sup>29</sup> 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>30</sup> In this regard, the Court has stated that “[it] cannot, in a provisional measure, consider the merits of any arguments pertaining to issues other than those which relate strictly to the extreme gravity and urgency and the necessity to avoid irreparable damage to persons.” I/A Court H.R., Matter of James et al. regarding Trinidad and Tobago, Provisional Measures, Order of August 29, 1998, considerandum 6 (Available only in Spanish); Case of the Barrios Family v. Venezuela, Provisional Measures, Order of April 22, 2021, considerandum 2 (Available only in Spanish).

Miranda, who was wanted for the same acts attributed to Mr. Gamaliel. When analyzing the situation of Reinaldo Picado in Costa Rica, the IACHR decided to grant precautionary measures in his favor via Resolution 90/2024 of November 25, 2024. On that occasion, the Commission considered that Mr. Reinaldo Picado Miranda faced a situation of risk in Costa Rica given the situation he could encounter if he were extradited, without first carrying out a comprehensive assessment of the specific situation he could face if deprived of his liberty in the current context in Nicaragua.<sup>31</sup> The Commission also learned that Mr. Douglas Gamaliel was a colleague and was prosecuted in the same manner as Mr. Picado Miranda for the same events; however, at the time he had already been extradited to Nicaragua.<sup>32</sup> In this sense, a series of risk indicators were noted, consistent with the context of serious human rights violations in Nicaragua.<sup>33</sup>

18. Taking into account the foregoing, the Commission will proceed to analyze the procedural requirements regarding the proposed beneficiary's situation in Nicaragua. Regarding the requirement of *seriousness*, the Commission considers it to be met, given that, as the applicant has indicated, the whereabouts or fate of the proposed beneficiary following his extradition and handover to the Nicaraguan state authorities on February 16, 2024, remain uncertain. The Commission stresses that, since that date, there has been no official information on the location, situation, or current status of the proposed beneficiary. In turn, the Commission observes that the only information available was obtained through the testimony of an individual who was released from prison in September 2024.<sup>34</sup> He indicated that the proposed beneficiary was allegedly admitted to the cells of "la 300" maximum security, also called "el infiernillo". He is allegedly in isolation, permanently shackled, naked, possibly under torture and under constant threat, and does not have a mosquito net. He is also allegedly not receiving medical attention.

19. Notwithstanding the above, the Commission understands that, after the proposed beneficiary was detained, his family members went to the La Modelo Penitentiary System in order to obtain information about his current status and conditions, in August 2024 and on subsequent dates. Despite several attempts, state authorities did not provide official data on the proposed beneficiary's situation. Therefore, the proposed beneficiary's friends and family have no way of obtaining accurate information on his whereabouts, despite the steps taken and actions carried out before the state authorities.

20. Having requested information from the State under Article 25 of the Rules of Procedure, the Commission regrets the lack of response to the request. Although the foregoing is not sufficient *per se* to justify the granting of a precautionary measure, the lack of communication from the State prevents the Commission from knowing the adopted measures that are purportedly being implemented to address the situation that places the proposed beneficiary at risk and to dispute the facts alleged by the applicant. Therefore, the Commission does not have information that would allow it to assess whether the alleged risks have been mitigated, or on the actions aimed at determining and confirming his location and current condition. The Commission also observes that, according to the information provided, the proposed beneficiary is reportedly in the custody of the State, which should be able to provide such details.

21. In line with the above, the Commission has no evidence that the proposed beneficiary was brought before the competent courts of Nicaragua, nor does it have any details on the progress of the legal proceedings against him. In addition to this, the Commission understands that his family members and attorneys allegedly did not activate the corresponding resources for his protection, such as the filing of a *habeas corpus*, given the possible reprisals that attorneys in Nicaragua reportedly face for taking on cases of individuals who are deprived of their liberty. Notwithstanding the above, the Commission considers that the State is fully

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<sup>31</sup> IACHR, [Resolution 90/2024](#), Precautionary Measures No. 330-24, Matter of Reinaldo Picado Miranda regarding Costa Rica, November 25, 2024.

<sup>32</sup> IACHR [Resolution 90/2024 of November 25, 2024](#), previously cited, para. 11.

<sup>33</sup> IACHR [Resolution 90/2024 of November 25, 2024](#), previously cited, para. 37.

<sup>34</sup> IACHR [Resolution 90/2024 of November 25, 2024](#), previously cited, para. 11.

aware of the proposed beneficiary's situation, as it reportedly participated in the extradition process, and therefore it learned of the claims raised by Mr. Pérez Centeno.

22. Thus, the Commission acknowledges that those close to the proposed beneficiary have not been able to contact him since his detention. They do not have any information on his current conditions or health, such as, for example: the place of detention; the detention conditions; or the possibilities of being able to contact legal representation he trusts; among other aspects. Given that contact with the proposed beneficiary has not been established, the situation that places him at risk is further aggravated by the inability to determine his whereabouts and verify his current circumstances. In this regard, the Commission recalls that the Inter-American Court has indicated, in the *Matter of Juan Sebastián Chamorro et al. v. Nicaragua*, that "detention without communication not only makes it impossible to verify the current state of the proposed beneficiaries, the conditions of their detention, and their health status, but it also implies a curtailment of the procedural guarantees of all detainees."<sup>35</sup>

23. In view of the foregoing considerations and in light of the *prima facie* standard, the Commission considers that the rights to life and personal integrity of the proposed beneficiary are at serious risk to the extent that, to date, there has been no official information about his fate or location, or about his current situation and detention conditions.

24. Regarding the requirement of *urgency*, the Commission deems that it has been met, inasmuch as the passage of time without confirming his whereabouts and current situation is likely to generate greater impacts on the rights to life and personal integrity of the proposed beneficiary. Additionally, the Commission has not received any response from the State regarding the actions that may be taken to address or mitigate the risk faced by the proposed beneficiary.

25. Regarding the requirement of *irreparable harm*, the Commission finds it met, given that the potential impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

## **V. BENEFICIARY**

26. The Commission declares Douglas Gamaliel Pérez Centeno, who is duly identified in this procedure, as the beneficiary.

## **VI. DECISION**

27. The Inter-American Commission 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 requests that Nicaragua:

- a) adopt the necessary measures to protect his rights to life and personal integrity. In particular, clarifying where he is being held in Nicaragua or his legal situation following his extradition to the country;
- b) specify whether, since his extradition from Costa Rica, he has been brought before the appropriate judicial authority, and if not, indicate the reasons for his detention without judicial review. Likewise, to report on his conditions of deprivation of liberty, including the procedural stage of the criminal case against him, and whether he has access to his legal representatives and family members, as well as the necessary health care; and

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<sup>35</sup> I/A Court H.R., *Matter of Juan Sebastián Chamorro et al. regarding Nicaragua*, Provisional Measures, Resolution of June 24, 2021, paragraph 36.

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- c) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent them from reoccurring.

28. The Commission requests that the State of Nicaragua report, within 15 days from the date of notification of this resolution, on the adoption of the precautionary measures requested and to update that information periodically.

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

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

31. Approved on April 6, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Roberta Clarke; and Carlos Bernal Pulido, members of the IACHR.

María Claudia Pulido  
Assistant Executive Secretary