

REPUBLIC OF THE PHILIPPINES  
DEPARTMENT OF JUSTICE  
OFFICE OF THE ( )CITY ( ) MUNICIPAL ( ) PROVINCIAL PROSECUTOR  
( )CITY ( ) MUNICIPALITY ( ) PROVINCE OF \_\_\_\_\_

\_\_\_\_\_  
Complainant,

- Versus -

DOCKET NO. \_\_\_\_\_  
FOR: Grave Coercion

\_\_\_\_\_  
\_\_\_\_\_  
Respondent/s,

X-----X

**COMPLAINT-AFFIDAVIT**

I, \_\_\_\_\_, of legal age, (single/married) Filipino, and with address at \_\_\_\_\_ after having been sworn in accordance with law, hereby depose and state:

1. Complainant is the parent of minor(s) \_\_\_\_\_ who are enrolled in \_\_\_\_\_ located in \_\_\_\_\_.
2. That sometime in \_\_\_\_\_ of 2021 the respondent ( ) principal ( ) dean ( ) president ( ) \_\_\_\_\_ on behalf of the respondent school \_\_\_\_\_, issued a notice that the unvaccinated children will not be allowed to ( ) enroll ( ) participate in face-to-face classes ( ) \_\_\_\_\_ because of the respondent school is afraid that unvaccinated children may transmit the Covid-19 virus to the vaccinated children and personnel in school.
3. In response, complainant informed the respondents that the said regulation is violative of his/her child/children's right to have access to education under Art. XIV Sec.1 of the 1987 Constitution. In addition, even in the event of a public health emergency, the reason for denying unvaccinated students from ( ) enrolling ( ) participating in face-to-face classes does not find support in science as both vaccinated and unvaccinated persons are susceptible to infection or transmission. In fact, there are instances when fully vaccinated individuals have died due to Covid-19. As such, the distinction also violates the right to equal protection of law under Art.III Sec.1 of the Constitution, as the said distinction is not germane to the purpose of the law.
4. That despite complainant's response, the respondent/s \_\_\_\_\_ still threatened complainant that if his/her child/children do not get vaccinated, he/she/they will not be allowed to ( ) enroll ( ) participate in face-to-face classes ( ) \_\_\_\_\_.

5. That because of the said ( ) threat ( ) intimidation ( ) violence that the respondent has shown complainant, the complainant's child/children's constitutional right under Art. XIV Sec.1 is violated and may cause damage to the future of complainant's children.
  
6. I am therefore executing this Complaint-Affidavit in support of the charges for Grave Coercion under Art. 286 of the Revised Penal Code against the said respondent, \_\_\_\_\_, who may be served with subpoena and other processes of this Honorable Office at (his/her) last known address at \_\_\_\_\_, Philippines.

IN WITNESS WHEREOF, I have hereunto set my hands this \_\_\_th day of \_\_\_\_\_, 20\_\_ at \_\_\_\_\_, Philippines.

\_\_\_\_\_  
Complainant

SUBSCRIBED AND SWORN to before me this \_\_\_th day of \_\_\_\_\_, 20\_\_ at \_\_\_\_\_, Philippines. I hereby certify that I have examined the Affiant and that I am fully satisfied that (he/she) has voluntarily executed and understood the contents of (his/her) Complaint-Affidavit.

\_\_\_\_\_  
Administering Officer