

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. I am a resident of _____ and I work in _____ where the use of public transportation is necessary for me to report for work.
2. That sometime in _____, I was told by the respondent () security guard of the MRT, () conductor of the bus/jeepney, () taxi driver () _____ that I am no longer allowed to use the transport services if I do not show a vaccination card. In response, I told them that I do not have a vaccination card because I do not want to be vaccinated and that this choice is protected by my constitutional right to life under Art.II Sec. 11 and Art. III Sec. 1 of the 1987 Constitution. That they cannot compel me to present a vaccination card because it amounts to compelling me to be vaccinated which I do not want.
3. That despite my call to respect my decision to be vaccination, I was () forced () threatened () intimidated by the respondent so as not to be able to use the transport services. In fact, _____
4. That because of the said () threat () intimidation () violence that the respondent has shown the complainant, the latter was not able to use the said transportation service and failed to report for work.
5. That even if there is a law which mandates vaccination, this compulsion to be vaccinated or else suffer from not being able commute to work is not only cruel but is violative of the constitutional right to life under Art.II Sec. 11 and Art. III Sec. 1. The distinction between vaccinated and unvaccinated individuals is not germane to the purpose for which the regulation is being implemented. That even in the interest of

public health, the distinction between vaccinated and unvaccinated persons is not germane to the purpose of the regulation as vaccinated persons are also potential carriers and spreaders of the virus as well. In fact, there are individuals who, despite being fully vaccinated, still died of Covid-19. This is in violation of the equal protection clause of the 1987 Constitution under Art. III. Sec.1.

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 _____ . 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