

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 the complainant in this case and I am a ( )pedicab ( ) tricycle, ( ) jeepney, ( ) bus operator in \_\_\_\_\_ with route within the territory of \_\_\_\_\_ city/province.
2. That sometime in \_\_\_\_\_, complainant was told by the respondent \_\_\_\_\_ that the former is no longer allowed to operate unless the complainant will have himself/herself vaccinated even though there is no law that makes vaccination mandatory. That unless the complainant will be vaccinated and show the proof of the said vaccination, the respondent will implement whatever ( )force, ( )threat or ( ) intimidation necessary to stop complainant from operating.
3. That in response, I told the respondent that I do not want to be vaccinated and there is no law in existence that compels me to be vaccinated. Complainant also feels that vaccination might cause him/her harm and put his/her life at risk. That there have been a lot of people known personally by the complainant who lost relatives after they got vaccinated and that complainant do not want to be one of those who die because of failure to be cautious. That complainant is the breadwinner of his/her family and needs to operate the said ( ) pedicab ( ) tricycle ( ) jeepney ( ) bus in order to support himself and his dependents. That since there are also cases where there are fully vaccinated people who died and suffered the adverse effects of the vaccine, complainant believes that the distinction between vaccinated and unvaccinated individuals is no longer relevant to the purpose they want to achieve.
4. That because of the said ( ) threat ( ) intimidation ( ) violence that the respondent has shown the complainant, the complainant is now suffering from loss of his/her source of

income and is now afraid that he will not be able to support his/her life and that of his/her dependents.

5. That even if there is a law which mandates vaccination, this compulsion to be vaccinated or else suffer from not being able to operate the complainant's ( )pedicab ( ) tricycle ( )jeepney ( ) bus is not only cruel but is violative of his/her constitutional right to life under Art.II Sec. 11 and Art. III Sec. 1 of the 1987 Constitution. 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