# JOINT CITIZENS' COMPLAINT-AFFIDAVIT

(with Prayer for Preventive Suspension)

We, **ELMER "KA BONG" CALAGUI LABOG**, **RONALDO MANGAMPO ADONIS, FERNANDO L. HICAP**, **DANILO H. RAMOS**, **GLORIA "KA BEA" G. ARELLANO**, **ESTRELITA "KA INDAY" R. BAGASBAS**, and **CATARINA T. ESTAVILLO**, who are concerned Filipino citizens, voters of legal age, and members of organized progressive groups in the Philippines, aver under oath the following facts for the consideration of the Honorable Office of the Ombudsman for the commencement of disciplinary proceedings to determine the administrative and criminal liabilities of the public official, Undersecretary **LORRAINE MARIE T. BADOY-PARTOSA**, complained of below:

1. I, ELMER "KA BONG" CALAGUI LABOG, with address at 5773 Tramo St., San Dionisio, Paranaque City, am a registered voter in Paranaque City, currently a Senatorial candidate under the Makabayang Koalisyon ng Mamamayan (MAKABAYAN), the Chairman of national labor center Kilusang Mayo Uno, the Vice President of Bagong Alyansang Makabayan (BAYAN), and the Chairman of the International League of Peoples Struggle-Philippines.

2. I, RONALDO MANGAMPO ADONIS, with address at 63 Narra St., Brgy. Claro, and the Vice President of Bagong Alyansang Makabayan (BAYAN), and the Secretary-General of national labor center Kilusang Mayo Uno.

3. I, FERNANDO "KA PANDO" L. HICAP, with address at 56 K-9 Street, Brgy. West Kamias, Quezon City, am a registered voter in Rosario, Cavite and the Chairperson of Pambansang Lakas ng mga Mamalakaya (PAMALAKAYA) for the last twenty (20) years.

4. I, DANILO H. RAMOS, with address at 56 K-9 Street, Brgy. West Kamias, Quezon City, am a registered voter in Malolos, Bulacan, and the Chairperson of Kilusang Magbubukid ng Pilipinas (KMP) since 2017 up to the present. I am a peasant leader in Bulacan and Central Luzon for more than thirty (3) years.

5. I, GLORIA "KA BEA" G. ARELLANO, with address at 890 Labanos St. Napico, Manggahan, Pasig City, am a registered voter in Pasig City and the National Chairperson of Kalipunan ng Damayang Mahihirap (KADAMAY).

6. I, ESTRELITA "KA INDAY" R. BAGASBAS, with address at 84 Santan St. Sitio San Roque, Brgy. Bagong Pag-asa, Quezon City, am a registered voter in Quezon City and the National Vice-Chairperson of KADAMAY.

7. I, CATARINA T. ESTAVILLO, with address at 80 Mapang-akit St., Brgy. Pinyahan, Quezon City, am a registered voter in Quezon City and the Secretary General of AMIHAN National Federation of Peasant Women as well as the Secretary General of Anakpawis Party-List.

8. We saw the Facebook posts authored and posted by Undersecretary Badoy-Partosa, the Undersecretary for New Media and External Affairs of the Presidential Communications Operations Office (PCOO), dated 14 March 2022 and 21 March 2022, which were presented as official statements of the National Task Force to End Local Communist Armed Conflict (NTF-ELCAC). We were appalled and deeply disturbed on how Undersecretary Badoy-Partosa uses the resources of the government not only to wantonly red-tag, maliciously attack and malign progressive individuals and groups but how she brazenly and publicly associates and links the presidential campaign of Vice President Maria Leonor S. Gerona-Robredo with the Communist Party of the Philippines (CPP), among others.

9. One post is dated 14 March 2022, with posting time at 9:14AM, as evidenced by checking the uniform source locator (URL) link: https://www.facebook.com/100066663642420/posts/3077818681205 99/. Attached to this Joint Citizens' Complaint-Affidavit is a printout of the said post printed on 27 March 2022, and marked as "**ANNEX A**."

10. We were individually able to access and view the same, which is tagged as a public post as evidenced by the "globe" symbol beside

the date and time of posting. For easy reference, quoted in full below are its textual contents:

*NTF ELCAC STATEMENT ON ROBREDO-CPP ALLIANCE*

*VP Leni Robredo's camp should stop insulting the intelligence of the Filipino people by pretending they have not made a pact with the devil, the communist terrorist CPP NPA NDF.*

*The mere fact that no less than the founder of this terrorist organization, Joma Sison tweeted his official endorsement of her is proof positive that this marriage made in the bowels of hell has been consummated.*

*Then of course, the urban operatives of the CPP NPA NDF, the sarcastically named Makabayan Bloc has also officially endorsed VP Robredo.*

*This endorsement comes straight from the Central Committee of the CPP–the authors of grief and suffering of the Filipino people –because the Kamatayan Bloc/KABAG are mere atsoys and atsays of the CPP who do the bidding of their terrorist bosses.*

*And so this endorsement of Leni Robredo is an endorsement of the Central Committee of the CPP NPA NDF, an organization that has been designated a terrorist organization by the Anti-Terrorism Council and that has also been declared a terrorist organization by the Philippines, US, UK, New Zealand, EU, Australia and Canada.*

*The Vice President should stop insulting our intelligence further by pretending this endorsement is completely one-way with no participation on her part.*

*There can be no endorsement without concessions.*

*She has, in other words, formed a tactical alliance with these communist terrorists that is mutually beneficial to the both of them.*

*And anything that benefits this terrorist organization means more pain and suffering for the Filipino people.*

*The VP cannot feign ignorance about who it is exactly she's been dealing with. She knows full well that it is the CPP NPA NDF that is behind the Makabayan Bloc/KABAG and she has sold us for a few pieces of silver.*

*This is why she shares the stage with CPP NPA NDF operative Neri Colmenares and why operatives of the CPP were spotted during her campaign sortie in Cavite: former Kabataan Rep Mong Palatino now head of the Regional Party Committee of the CPP Metro Manila Regional Party Committee, Obet de Castro, National United Front Committee of the CPP and urban infiltrator of the Movement Against Tyranny, Axel Pinpin of the Regional Urban Party Committee using the mask of KMP/ANAKPAWIS Coordinator– some of those responsible for the hakot crowd mobilized by CPP fronts–GABRIELA, KADAMAY, ANAKBAYAN, ANAKPAWIS. And this hakot crowd is part of the agreed upon concessions with the terrorist group.*

*This is why the VP has been a virtual mouthpiece of the terrorist group these past years– asking for the abolition of the task force mandated to end the 53 year reign of terror of the CPP NPA NDF, the National Task Force To End Local Communist Armed Conflict.*

*A task force headed by our President that's clocked amazing gains and that has made peace and progress a reality for millions of Filipinos with the surrender of close to 24,000 former rebels, the weakening and dismantling of unprecedented numbers of whole guerilla fronts, the institutionalizing of good governance by way of the Barangay Development Program which our President has expressly stated is the way to finally end this 53 year terrorist curse.*

*She has also repeatedly used the term "redtagging" -a tool the CPP uses to silence those who speak the truth about their fronts despite the consistent verdict given by our courts of law-including our Supreme Court that there is no threat to life, liberty and security when one is identified as a "member of the CPP NPA NDF".*

*And for each and every time she has uttered that lie- "redtagging"- she has provided cover for these terrorists.*

*She has also promised to resume the bogus peace talks if she ever becomes president– these bogus peace talks that are so totally bereft of sincerity, that the body count of our men and women in uniform reach sky-high and the recruitment of our children into the NPA peaks each and every time the Philippine government made the mistake of negotiating peace with these terrorists.*

*The Makabayan Bloc is the political machinery of the terrorist CPP NPA NDF that they employ during elections to pervert our democratic processes with the express goal of gaining political power that they will then use to continue the 53 year-bloodbath they have wreaked on the Filipino people.*

*And so we are sorry to tell those who have given their precious trust to the VP that she has betrayed us all.*

*There is a way she can redeem herself though and it is this: to stand united with the people she has sworn to defend and protect and to publicly denounce the CPP NPA NDF and ALL the atrocities they have committed against the Filipino people for the past 53 years and to swear to work with the NTF ELCAC to finally end what should have ended a very long time ago: the CPP NPA NDF.*

*She must also ask the Makabayan Bloc to share the stage with her and do the very same thing: denounce the murders of Kieth and Nolven Absalon, the massacre of 39 members of the Bagobo Tagabawa tribe in Rano, the murder of our tribal chiefs, the countless murders of our indigenous peoples, our children, our people.*

*Every Filipino who's had the audacity to ask us for our trust must be able to stand united with the nation and do this simple act.*

*We therefore await the Vice President's public condemnation of the CPP NPA NDF and her open invitation for the KABAG to do the same.*

*Otherwise we will rightfully conclude that she is not worthy of our trust and that she values the few votes the CPP NPA NDF claims they can give her far more than our lives and the lives of our children and the destiny of our country.*

*Undersecretary Lorraine Marie T. Badoy*
*NTF ELCAC Spokesperson for Sectoral Concerns*

11. Said post is also viewable on the NTF-ELCAC's website, with the following URL link: https://www.ntfelcac.org/post/ntf-elcac-statement-on-robredo-cpp-alliance. A printout of the same dated 27 March 2022 is also attached to this Joint Citizens' Complaint-Affidavit as "**ANNEX B**."

12. On 21 March 2022, showing her unrestrained propensity to spread lies, disinformation and baseless accusations in social media using her public position, the NTF-ELCAC Facebook account and website again featured a statement with Undersecretary Badoy-Partosa's byline, which is quoted below in full:

*NTF ELCAC Statement On Vice President Leni Robredo*

*It has been a week since the NTF ELCAC has asked the Vice President to stand with us in our shared ground of love for country by publicly condemning the terrorist CPP NPA NDF- and to disprove what we've alleged: that she knowingly made concessions with the terrorist CPP-NPA NDF - to earn their endorsement by way of KABAG-KABATAAN, ANAKPAWIS, BAYAN MUNA, ACT, GABRIELA- who are urban operatives of the CPP NPA NDF.*

*That she cannot do such a simple act is cause for concern because there is just one other political group that refuses to do this.*

*And this is the KABAG who have hemmed and hawed and confabulated and used the biggest words in the English language and thrown everything at this simple challenge simply because what the NTF ELCAC says is the sparkling Truth:*

*KABATAAN PARTYLIST IS CPP NPA NDF. This is the simple truth.*

*ANAKPAWIS PARTYLIST IS CPP NPA NDF. This is the simple truth.*

*BAYAN MUNA PARTYLIST IS CPP NPA NDF. This is the simple truth.*

*ALLIANCE OF CONCERNED TEACHERS (ACT) PARTYLIST IS CPP NPA NDF. This is the simple truth.*

*GABRIELA PARTYLIST IS CPP NPA NDF. This is the simple truth.*

*And these bunch of terrorist enablers have had the bloody gall to stand before the Filipino people - campaigning and asking that we trust them while at the same time lying to us about who it is they truly are: urban operatives of the CPP NPA NDF tasked to infiltrate Congress in order to overthrow government and have another round of raping our people and causing untold harm on the most helpless among us and to once again use the mighty powers of Congress to obstruct our country's progress.*

*So Madam Vice President, we repeat our request for you to stand with us in our shared ground of love for our children whom these terrorists have targeted and our shared ground of love for country which these terrorists have destroyed and issue a public condemnation of this communist terrorist organization- the CPP NPA NDF.*

*We also ask our Vice President's followers to demand this of her- just as we ask each and every Filipino to demand that every candidate asking for their trust do this: CONDEMN THE CPP NPA NDF.*

*This is our end of the bargain as citizens: to keep the noses of our officials clean by demanding of them utmost fidelity.*

*Any candidate that cannot do this is not worthy of our trust and will use the powers of his/her office to torment us because of their ties with this terrorist organization.*

*We await that public condemnation, Madam VP. The moment you do this, pinapanalo mo agad agad ang Pilipinas. Ganyan kabigat ang opisinang bitbit mo.*

*This goes beyond politics and is all about country now.*

*Hindi tayo ang magkakaaway, Madam VP. Iisa lang ang kaaway natin at ito ay wala ng iba kundi ang teroristang CPP NPA NDF.*

*Aantayin namin ang mga katagang ito sa iyo na sinasabi na ng bawat Pilipinong nagmamahal sa Inang Bayan:*

*I DENOUNCE THE CPP NPA NDF AND I ASK THE MAKABAYAN BLOC WHOSE ENDORSEMENT I ACCEPTED TO DO THE SAME.*

*Napakadali.*

*Undersecretary Lorraine Marie T. Badoy*
*Spokesperson NTF ELCAC for Sectoral Concerns*

13. The abovementioned follow-up post is with the following URL link: https://www.facebook.com/ntfelcac/posts/312461070986012. It was posted on 21 March 2022 at 10:00AM and tagged as "public." A printout of the same dated 27 March 2022 is attached as "**ANNEX C**."

14. Said follow-up post is also reproduced word-for-word on the NTF-ELCAC's website, with the following URL link: https://www.ntfelcac.org/post/ntf-elcac-statement-on-vice-president-leni-robredo. A printout of the same dated 27 March 2022 is attached as "**ANNEX D**."

15. On 23 March 2021, twenty-six (26) complainants filed before this Honorable Office three (3) separate complaints arising from the posts mentioned above alleging multiple violations by Undersecretary

Badoy-Partosa of the Anti-Graft and Corrupt Act and the Code of Conduct and Ethical Standards for Public Officials and Employees.[1] The said filings were the sixth time Undersecretary Badoy-Partosa faces accusations of impropriety for red-tagging and spreading disinformation after similar complaints were filed by IBON, rights group Karapatan, the National Union of People's Lawyers, and Kabataan.[2]

16. On the same day, 23 March 2021, Undersecretary Badoy-Partosa replied to questions relating to said filings and quipped,

"There is no such things as 'redtagging'. No less [than] the Supreme Court has ruled that there is no danger to life, liberty and security when one is identified as a member of the CPP NPA NDF."

She added,

"The term redtagging is a tool used by the CPP NPA NDF fronts to silence those who are about to blow their cover.[3]

17. The number and frequency of red-tagging by Undersecretary Badoy-Partosa using her position and delegated authority are alarming and calls for a resolute disciplinary action by this Honorable Office.

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1 *See* Complaint lodged in Ombudsman vs NTF-Elcac spox dated 23 March 2022 available at https://newsinfo.inquirer.net/1572508/complaints-lodged-in-ombudsman-vs-ntf-elcac-spox#Echobox=1648015903, last accessed on 27 March 2022; NTF-ELCA's. Lorraine Badoy sued at Ombudsman over red-tagging spree dated 23 March 2022 available at https://www.philstar.com/headlines/2022/03/23/2169362/ntf-elcacs-lorraine-badoy-sued-ombudsman-over-red-tagging-spree, last accessed on 27 March 2022; Youth leaders, activists file complaints vs Badoy for red-tagging Robredo dated 23 March 2022 available at https://mb.com.ph/2022/03/23/youth-leaders-activists-file-complaints-vs-badoy-for-red-tagging-robredo/?swcfpc=1 last accessed on 27 March 2022; Activists sue NTF-ELCAC's Badoy for allegedly red-tagging Robredo campaign dated 23 March 2022 available at https://www.gmanetwork.com/news/topstories/nation/826017/activists-sue-ntf-elcac-s-badoy-for-allegedly-red-tagging-robredo-campaign/story/, last accessed on 27 March 2022.

2 *See* After red-tagging Robredo, Badoy faces suspension threat at Ombudsman dated 23 March 2022 available at https://www.rappler.com/nation/after-red-tagging-lorraine-badoy-faces-suspension-threat-ombudsman/, last accessed on 27 March 2022.

3 *See* ABS-CBN News twitter thread dated 23 March 2022 available at https://twitter.com/ABSCBNNews/status/1506569188193681411 , last accessed on 27 March 2022.

18. Undersecretary Badoy-Partosa's unbridled abuse of her office and position as NTF-ELCAC Spokesperson for Sectoral Concerns to vilify Vice President Robredo at the height of the campaign season is shocking if not scandalous. Taking advantage of her public position and the infrastructure of state media, Undersecretary Badoy-Partosa is unduly influencing public opinion against Vice President Gerona-Robredo, by associating the latter's presidential campaign with the CPP.

19. We denounce and condemn in the strongest terms her misuse of her delegated power and authority and implore this Honorable Office to discipline and to suspend her from office without delay for such breach of the public's trust.

20. We have been advised by our legal counsels that the authorship and dissemination of these red-tagging posts are bases for multiple criminal and administrative liabilities of Undersecretary Badoy-Partosa, to be discussed in the following paragraphs.

21. Firstly, these constitute two *prima facie* violations of Section 3, Paragraph (e) of Republic Act (RA) No. 3019, otherwise known as the Anti-Graft and Corrupt Practices Act. Undersecretary Badoy-Partosa's posts—done in the discharge of her official duties—clearly caused undue injury to the public reputation of Vice President Robredo, her presidential campaign and of the organized progressive groups that we represent, due to the language of the same, which is tainted with obvious manifest partiality and evident bad faith.

22. Secondly, the posts are also clear violations of the ethical standards set forth in RA 6713, otherwise known as the Code of Conduct and Ethical Standards for Public Officials and Employees, which states under Section 2 that the State is "to promote a high standard of ethics in public service," and that "[p]ublic officials and employees shall at all times be accountable to the people and shall discharge their duties with utmost responsibility, integrity, competence, and loyalty, act with patriotism and justice, lead modest lives, and uphold public interest over personal interest."

Undersecretary Badoy-Partosa's actions are clear breach of Section 4, Paragraphs (a) to (c) of the Code of Conduct and Ethical Standards for Public Officials and Employees, which enjoins her commitment to public interest, professionalism, and justness and sincerity.

She was dishonest and unjust in spreading baseless accusations against Vice President Robredo and the organized progressive groups that we represent which she enumerated in her posts. She manifested her lack of commitment to public interest, professionalism, justness and sincerity after she shamelessly used public resources, government online infrastructure and NTF-ELCAC official website to damage the reputation of Vice President Robredo, her presidential campaign and of those other personalities and groups mentioned in her posts.

23. Thirdly, the posts evidently constitute partisan political activity, which Undersecretary Badoy-Partosa as NTF-ELCAC Spokesperson for Sectoral Concerns is prohibited from doing. Such act is penalized under Section 261, Paragraph (i) of *Batas Pambansa Blg.* 881, otherwise known as the Omnibus Election Code, and further prohibited under Book V, Title I(A), Chapter 8, Section 55 of Executive Order No. 292 (s. 1987), otherwise known as the Administrative Code of 1987.

    Undersecretary Badoy-Partosa is also not among the list of excluded persons under Joint Circular No. 001 (s. 2016) of the Commission on Elections and the Civil Service Commission (entitled "JOINT COMELEC-CSC ADVISORY ON ELECTIONEERING & PARTISAN POLITICAL ACTIVITIES"), thus she is prohibited from activities such as authoring the posts in question.

    Undersecretary Badoy-Partosa is obligated to heed the admonitions provided in Memorandum from the Executive Secretary dated 08 November 2021, "REMINDER TO UPHOLD THE PRINCIPLE OF POLITICAL NEUTRALITY IN THE GOVERNMENT SERVICE AT ALL

TIMES," attached to this Joint Citizens' Complaint-Affidavit as "**ANNEX E**."

Specifically, said Memorandum states that "[t]he prohibition on electioneering and partisan political activities shall be applied without regard to the candidate or party supported, and shall extend to any conduct of officials and employees of government whether in traditional (*e.g.*, print or broadcast media) or new media (*e.g.*, social media, online blogs or any form of media in cyberspace)."

24. Lastly, Undersecretary Badoy-Partosa's authorship of the posts in question constitutes grave misconduct, oppression, and conduct prejudicial to the best interest of the service that are punishable under civil service rules and regulations.

Grave misconduct, as defined in *Domingo v. Civil Service Commission*,[4] is "a transgression of some established and definite rule of action, more particularly, unlawful behavior or gross negligence by a public officer" where there are "elements of corruption, clear intent to violate the law or flagrant disregard of established rules." Given the language and political context of the post in question *vis-à-vis* the standards and prohibitions discussed above, Undersecretary Badoy-Partosa's authorship thus constitutes a *prima facie* case for this administrative offense.

Conduct prejudicial to the best interest of the service, according to the same case, is "an administrative offense which need not be related to the respondent's official functions," and acts are constitutive of the same "as long as they tarnish the image and integrity of his/her public office."[5] Evidently, Undersecretary Badoy-Partosa's utilization of public online resources to besmirch the character of the incumbent Vice President and a presidential candidate—without basis in fact and with malicious intent—hinders the operational efforts of the NTF-ELCAC in terms of addressing the ongoing communist insurgency. Given the fact that the NTF-ELCAC's

4 G.R. No. 236050, 17 June 2020.

5 Id., citing Pia v. Gervacio, G.R. No. 172334, 05 June 2013.

work and operations have a direct bearing upon the peacekeeping and counter-insurgency functions of the Armed Forces of the Philippines, the post in question indeed has a prejudicial effect on the non-partisan integrity of the Philippine military and defense establishment.

Oppression, as defined in *Office of the Ombudsman v. Caberoy*,[6] is also known as "grave abuse of authority, which is a misdemeanor committed by a public officer, who under color of his office, wrongfully inflicts upon any person any bodily harm, imprisonment, or other injury. It is an act of cruelty, severity, or excessive use of authority." While Undersecretary Badoy-Partosa admittedly did not subject Vice President Robredo or her presidential campaign to bodily harm or imprisonment, her authorship of the posts in question was indeed a grave abuse of her functions as NTF-ELCAC Spokesperson for Sectoral Concerns that unnecessarily subjected Vice President Robredo and her presidential campaign to undue and unwarranted association with the CPP, exposing them to more online abuse and public derision in addition to what is already present during the campaign for the 09 May 2022 National and Local Elections.

25. Given the foregoing, we believe that Undersecretary Badoy-Partosa should be disciplined and held accountable for all her actions relating to her unlawful red-tagging and unrestrained dissemination and spread of disinformation, with obvious intent to destroy the reputation of her subjects. Her deplorable acts are not isolated as evidenced by the many pending complaints and cases filed against her. Her track-record is disgraceful and does not befit a public official.

26. Thus, we believe that this timely invocation of the primary jurisdiction of the Office of the Ombudsman under RA 6770, otherwise known as the Ombudsman Act of 1989, is just and proper. The Ombudsman's investigation of instances such as the present matter is warranted "to determine whether there are facts that merit

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6 G.R. No. 188066, 22 October 2014.

disciplinary measures against erring public officers and employees, with the purpose of maintaining the dignity of public service."[7]

27. Further, due to the online nature of the authorship of the post in question, Section 6 of RA 10175, otherwise known as the Cybercrime Prevention Act of 2012, is applicable for purposes of determining Undersecretary Badoy-Partosa's criminal liabilities. Said section states that all crimes defined in the Revised Penal Code and special laws, "if committed by, through and with the use of information and communication technologies, shall be covered by the relevant provisions of this Act," and that "[t]he penalty to be imposed shall be one (1) degree higher than that provided for by the Revised Penal Code, as amended, and special laws, as the case may be." Based on the foregoing, we pray that Undersecretary Badoy-Partosa be penalized to the fullest extent of the law possible.

28. For purposes of this Joint Citizens' Complaint-Affidavit, Undersecretary Badoy-Partosa may be served summons at her official address: either the new address of the PCOO (7th Floor, Times Plaza Building, United Nations Avenue, Ermita, Manila) or its old one (2nd Floor, New Executive Building, Malacañang Palace Compound, Jose P. Laurel Street, San Miguel, Manila).

29. Wherefore, we are executing this Joint Citizens' Complaint-Affidavit and aver the truth of the foregoing, with the following prayer:

a) That the Office of the Ombudsman, on the basis of this Complaint-Affidavit, take cognizance of the same and accordingly institute and docket a case against **LORRAINE MARIE T. BADOY-PARTOSA**, presently the Undersecretary for New Media and External Affairs of the Presidential Communications Office and concurrently the Spokesperson for Sectoral Concerns of the National Task Force to End Local Communist Armed Conflict, for two (2) counts of all the aforementioned criminal and administrative liabilities based on the two (2) aforementioned posts; and

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7 Lumiqued v. Exevea, G.R. No. 117565, 18 November 1997.

b) That the Office of the Ombudsman, in order to preserve the evidence and prevent the unwarranted influence of Undersecretary Badoy-Partosa during the course of the present proceedings, preventively suspend Undersecretary Badoy-Partosa for the remaining duration of the presidential term, *i.e.*, until 30 June 2022.

30 March 2022, Quezon City.

NOTHING FOLLOWS.

**ELMER CALAGUI LABOG**
*Co-Complainant*

**RONALDO MANGAMPO ADONIS**
*Co-Complainant*

**FERNANDO L. HICAP**
*Co-Complainant*

**DANILO H. RAMOS**
*Co-Complainant*

**GLORIA G. ARELLANO**
*Co-Complainant*

**ESTRELITA R. BAGASBAS**
*Co-Complainant*

**CATARINA T. ESTAVILLO**
*Co-Complainant*

SUBSCRIBED AND SWORN to me on _____ in _____, Co-Complainants having exhibited the following as competent proof of their identities:

| NAME | ID NO. | EXPIRY |
|---|---|---|
| ELMER CALAGUI LABOG | | |
| RONALDO MANGAMPO ADONIS | | |
| FERNANDO L. HICAP | | |
| DANILO H. RAMOS | | |
| GLORIA G. ARELLANO | | |
| ESTRELITA R. BAGASBAS | | |
| CATARINA T. ESTAVILLO | | |

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Book No. _____.
Series of 2022.