

REPUBLIC OF THE PHILIPPINES
COMMISSION ON HUMAN RIGHTS
[Regional Office – Region VII]
Cebu City

[NAME OF COMPLAINANT/S],
Complainant,

-versus-

CEBU CITY POLICE OFFICE (CCPO),
COL. GEORGE YLANAN, in his official capacity,
and OTHER JOHN/JANE DOES,
Respondents.

COMPLAINT-AFFIDAVIT

FOR HUMAN RIGHTS VIOLATIONS

I. INTRODUCTION

I, [Name of Complainant], Filipino, of legal age, and a resident of [address], after having been duly sworn, depose and state:

1. I am filing this Complaint-Affidavit for violations of my constitutional and statutory rights arising from the implementation of the so-called “**Safer Cities Initiative**” in Cebu City.
 2. I am either:
 - () A direct victim of unlawful apprehension;
 - () A parent/guardian of a minor apprehended;
 - () A concerned citizen/organization representing affected individuals.
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II. RESPONDENTS

3. Respondent **Cebu City Police Office (CCPO)** is the police unit responsible for implementing the operations subject of this complaint.
 4. Respondent **Col. George Ylanan**, in his official capacity, exercised command responsibility over the operations.
 5. Other unidentified police officers (**John/Jane Does**) directly carried out the apprehensions.
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III. STATEMENT OF FACTS

6. On or about April 8–9, 2026, Respondents conducted large-scale operations under the “Safer Cities Initiative.”
7. Reports indicate that **hundreds of individuals (784 on April 9 alone)** were apprehended in a single night.
8. The apprehensions involved minor ordinance violations, including:
 - Curfew violations
 - Public smoking and drinking
 - Alleged indecency (e.g., shirtless presence in public)
 - Noise violations
 - Minor traffic and obstruction violations
9. Among those apprehended were **approximately 197 minors**, who were taken into custody.
10. During the operations, many individuals—including myself/our members—experienced the following:
 - a. **Arbitrary apprehension** without clear explanation of the violation;
 - b. **Failure of police officers to identify themselves properly**;
 - c. **Failure to inform detainees of their constitutional rights**, including the right to counsel;
 - d. **Coercion or pressure to immediately pay fines**;
 - e. **Public shaming or degrading treatment** during apprehension;
 - f. **Improper handling of minors**, including temporary detention without immediate turnover to guardians.
11. The operations were conducted in a **mass, indiscriminate, and quota-driven manner**, prioritizing volume of arrests over lawful and rights-based enforcement.

IV. HUMAN RIGHTS VIOLATIONS

A. Violation of the Right to Due Process

12. The Constitution guarantees that no person shall be deprived of liberty without due process of law.
13. The mass apprehensions lacked:
 - Individualized determination of probable cause
 - Proper explanation of charges
 - Access to counsel
14. These constitute **clear violations of procedural due process**.

B. Violation of the Right Against Arbitrary Arrest

15. Many apprehensions were conducted without valid basis for **warrantless arrest**, as required by procedural law.
16. Arrests for vague or subjective violations (e.g., “indecent,” “noise”) were implemented arbitrarily.

C. Violation of the Right to Equal Protection

17. Enforcement disproportionately affected:
 - Youth
 - Urban poor
 - Informal workers
18. This indicates **selective and discriminatory enforcement**.

D. Violation of the Rights of Children

19. The apprehension of minors violated **Republic Act No. 9344 (Juvenile Justice and Welfare Act)**, which mandates:
 - Diversion instead of punitive action
 - Immediate release to parents or guardians
 - Protection from custodial detention

20. The mass custody of minors constitutes **serious child rights violations**.

E. Violation of Human Dignity

21. The manner of enforcement resulted in:

- Public humiliation
- Degrading treatment
- Intimidation

22. These acts violate the fundamental principle that **human dignity must be respected at all times**.

V. COMMAND RESPONSIBILITY

23. Respondent **Col. George Ylanan**, as head of the CCPO, is responsible for:

- Planning and supervision of operations
- Ensuring compliance with human rights standards

24. The scale and pattern of violations indicate **systemic failure or deliberate policy**, making him administratively liable under the doctrine of command responsibility.

VI. EVIDENCE

25. Complainant/s shall present:

- Personal affidavits of victims
 - Photographs/videos of operations
 - Medical or psychological reports (if applicable)
 - News reports and public records
 - Other relevant documentary evidence
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VII. RELIEFS SOUGHT

WHEREFORE, premises considered, Complainant respectfully prays that the Commission on Human Rights:

1. **CONDUCT a MOTU PROPRIO INVESTIGATION** into the Safer Cities Initiative operations;

2. **FIND probable cause** for human rights violations against Respondents;
 3. **RECOMMEND the filing of appropriate administrative, civil, and/or criminal charges** against responsible officers;
 4. **ISSUE POLICY RECOMMENDATIONS** to ensure rights-based enforcement of local ordinances;
 5. **DIRECT immediate safeguards**, including:
 - Proper handling of minors
 - Mandatory rights advisories
 - Body camera or documentation protocols
 6. **GRANT** such other reliefs as may be just and equitable.
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VIII. VERIFICATION

I hereby certify that the foregoing statements are true and correct based on my personal knowledge and/or authentic records.

[Signature]

[Name of Complainant]

[Date]

IX. SUBSCRIBED AND SWORN

SUBSCRIBED AND SWORN to before me this ___ day of _____ 2026, affiant exhibiting to me his/her valid identification.

Doc. No. _____

Page No. _____

Book No. _____

Series of 2026