

JUDICIAL AFFIDAVIT OF HAIDEE O. SUELEN

The judicial affidavit of the witness was taken and recorded at the office of Center for International Law (Centerlaw) - Philippines, located at 1105 Antel Corporate Centre, 121 Valero St., Salcedo Village, Makati City, with ATTY. CRISTINA I. ANTONIO conducting the examination of the witness. The witness, who has limited knowledge of the English language but is fluent in Filipino, has been advised in Filipino: 1) to answer truthfully the questions being asked of her; 2) is and has been made aware that her testimony is under oath; and 3) that she may be criminally liable for perjury or false testimony on account of the answers that she will give. The questions, initially propounded in English, were translated in Filipino for the benefit of the witness. The answers of the witness in Filipino were recorded as is but translated into English in this Judicial Affidavit.

PETITIONERS' COUNSEL: Your Honor, we formally offer the testimony of witness Haidee O. Suelen for the purpose of proving the following:

1. She is one of the Petitioners in the instant case;
2. She is the niece of Ramon Rodriguez, who was shot and killed inside his house on June 10, 2017 at around 2:00 in the morning;
3. She saw the perpetrators in police uniform and civilian clothes on the alley prior to the shooting of Ramon Rodriguez inside his house;
4. The police stationed at the Police Community Precinct in Dagonoy St., San Andres Bukid, Manila, which is under the Manila Police District (MPD) Station 6 in Sta. Ana, Manila were in close coordination with the perpetrators in the killing of Ramon Rodriguez;
5. Because of the killing of her uncle Ramon Rodriguez, combined with the continuing incidents of extralegal killings, illegal arrests, illegal searches, harassment and

intimidation by the police assigned in Manila Police District Station 6, and other grave violations of the constitutional rights to life, liberty and security, she and all other residents of Sta. Ana and San Andres Bukid, Manila are paralyzed by fear;

6. All the other allegations in the Petition for the Issuance of the Writ of Amparo.

Q1. Please state your name and personal circumstances.

(Pakisabi ang iyong pangalan at iba pang personal na impormasyon.)

A1. Ako si Haidee O. Suelen, 43 taong gulang, Pilipino at nakatira sa 2346 Arellano St., Sta. Ana, Manila.

(I am Haidee O. Suelen, 43years old, Filipino and a resident of 2346 Arellano St., Sta. Ana, Manila.)

Q2. How long have you been a resident of here in Sta. Ana?

(Gaano ka na katagal dito sa Sta. Ana bilang residente?)

A2. Dito na po ako ipinanganak at lumaki.

(I was born and raised here.)

Q3. What is your work?

(Ano ang iyong trabaho?)

A3. Sa bahay lang po ako.

(I just stay in the house.)

Q4. Where were you at one-thirty in the early morning of June 10, 2017?

(Nasaan po kayo sa ganap na ala una y media ng madaling araw noong ika-10 ng Hunyo, 2017?)

A4. Nasa loob po ako ng aming bahay, sa taas po.

(I was inside our house, upstairs.)

Q5. Who else was with you in your house at that time, if any?

(Sino po ang kasama ninyo sa loob ng bahay noong mga oras na iyon, kung mayroon?)

A5. Ang mister ko po na si Ruel Suelen at ang dalawa kong anak. Nasa baba po ang nanay ko, si Paz Oregas.

(My husband, Ruel Suelen, and my two children. My mother, Paz Oregas, was downstairs.)

Q6. What were you doing at that time?

(Ano po ang ginagawa ninyo sa mga oras na iyon?)

A6. Pahiga na ako noon. Tulog na ang asawa ko dahil lasing. Inaantay ko lang matulog ang mga anak ko kasi hindi ako makatulog kapag hindi pa lahat sila tulog.

(I was about to go to bed. My husband was already asleep because he was drunk. I was just waiting for my kids to sleep as I can't sleep until all of them have fallen asleep.)

Q7. As you were about to go to bed, what happened, if any?

(Nang pahiga na po kayo, ano ang mangyari, kung mayroon man?)

A7. May narinig akong malalakas na putukan, sunod-sunod.

(I heard loud gunshots, one after the other.)

Q8. How many gunshots did you hear?

(Ilang putok ang narinig ninyo?)

A8. Mga lima.

(Around five.)

Q9. When you heard gunshots, what did you think?

(Nang makarinig kayo ng mga putok, ano ang inisip ninyo?)

A9. Sabi ko sa sarili ko, naku, mukhang may patay na. Kasi may putok e.

(I said to myself, my goodness, it looks like someone is dead. There were gunshots, you see.)

Q10. What happened after you heard the gunshots?

(Ano ang nangyari matapos ninyong marinig ang mga putok?)

A10. Nagtahulan ang mga aso, kaya sumilip ako sa terrace.

(The dogs started barking, so I went to the terrace and peeped down.)

Q11. What did you see?

(Ano po ang nakita ninyo?)

A11. Nakita ko ang maraming lalaki sa daanan namin, nagfa-flashlight na.

(I saw many men in our alley, bearing flashlights.)

Q12. What did the men bearing flashlights look like?

(Ano ang itsura ng mga lalaking nagfa-flashlight?)

A12. Marami ang naka-sibilyan, ang ilan naka-uniporme ng pulis, 'yung blue. Marami sila, malalaki ang katawan

(Many were in civilian clothes, some were wearing the blue police uniform. There were many of them, big men.)

Q13. How many men in police uniform did you see?

(Ilan ang nakita ninyong naka-uniporme ng pulis sa mga kalalakihan?)

A13. Siguro mga lima..

(Maybe around five..)

Q14. And how many were in civilian clothes?

(At ilan pong naka-sibilyan?)

A14. Marami rin po, mga sampu.

(They were many as well, around ten.)

Q15. What were the men doing?

(Ano ang ginagawa ng mga kalalakihan?)

A15. Itinututok nila 'yung mga flashlight nila sa mga bahay at bintana at sinisigaw: "Walang sisilip! Pumasok kayo, walang manonood! Bawal lumabas! Walang titingin, walang lalabas!"

(They were training their flashlightson the houses and windows and shouting: "Don't peep! Go inside, don't watch! No one is allowed to go out! Don't look, don't go out!")

Q16. After seeing the men training their flashlights on the houses and shouting, what happened?

(Nang makita mo ang mga lalaki na nagfa-flashlight sa mga bahay at sumisigaw, ano ang sumunod na nangyari?)

A16. Natanaw ko pong papalabas ang nanay ko ng pintuan ng bahay namin. Pinapasok siya pabalik sa loob ng isang mama, 'yung naka-sibilyan.

(I saw my mother about to go out of the doorway of our house. She was shoed back in by a man in cioilian clothes.)

Q17. What did you do next?

(Ano ang sumunod mong ginawa?)

A17. Mula sa taas ng bahay, nakasilip pa rin akong ganun. Nakarinig ako ng ingay at komosyon mula sa eskinita paliko sa kanan ilang metro mula sa amin. Nagkakasigawan. Parang may ginigiba.

(From upstairs, I continued to peep. I heard noises and commotion from the alley turning right a few meters from our house. There was shouting. As if something was being torn down.)

Q18. What were you feeling while you were listening to the noise and commotion outside?

(Ano ang iyong nararamdaman nang pinapakinggan mo ang mga ingay at komosyon sa labas?)

A18. Takot na takot po ako.

(I was terrified.)

Q19. What did you do next?

(Ano ang sumunod mong ginawa?)

A19. Inantay po naming tumigil ang komosyon.

(We waited for the commotion to stop.)

Q20. When the commotion stopped, what happened next?

(Noong tumigil ang komosyon, ano ang nangyari?)

A20. Mula sa terracc, may nakita akong dumaan. Nakilala ko siya bilang anak ng tindera ng siomai na tagaroon din. Tinanong ko: "Sino ang na-Tokhang doon?"

(From the terrace, I saw someone pass. I recognized him as the son of a siomai vendor who lives in our neighborhood. I asked: "Who was killed through Tokhang over there?")

Q21. What was his response?

(Ano ang sagot niya?)

A21. Sabi niya: "Si Boy Jacket."

(He said: "Boy Jacket.")

Q22. What was your reply, if any?

(Ano ang iyong tugon, kung mayroon?)

A22. Napabulalas ako: "Ila?! E tiyuhin ko 'yun a! Bakit?!"

(I burst out: "What?! That's my uncle! Why?!")

Q23. Who is the uncle to whom you referred?

(Sino ang tiyuhin na nabanggit mo?)

A23. Siya po si Ramon Rodriguez. Isa po siya manggagawa ng susi at nagkukumpuni ng mga sapatos at payong. Nakatira po siya sa eskinita malapit sa amin. Siya na pala ang tinokhang.

(He is Ramon Rodriguez. He makes keys and repairs shoes and umbrellas for a living. He lives in the alley near us. He was the one killed through Tokhang.)

Q24. What did you do next?

(Ano ang sumunod mong ginawa?)

A24. Lumabas na kami ng nanay ko ng bahay. Pumunta na kami sa bahay ng tiyuhin kong Ramon.

(My mother and I already went outside. We proceeded to the house of my Uncle Ramon.)

Q25. What did you find at the house of your Uncle Ramon?

(Ano ang nakita ninyo sa bahay ng iyong Tiyo Ramon?)

A25. May nakita kaming mga tatlo o apat na pulis na nakabantay sa labas ng bahay.

(We saw four or five policemen standing guard outside the house.)

Q26. How did you know they were policemen?

(Paano ninyo nalaman na mga pulis sila?)

A26. Naka-uniporme sila ng pulis. Namukhaan ko rin sila na pulis sa presinto sa Block 1 sa San Andres Bukid.

(They were in police uniform. Also, I recognized them as policemen often stationed at the precinct at Block 1 in San Andres Bukid)

Q27. Upon seeing the policemen, what did you do?

(Nang makita ninyo ang mga pulis, ano ang ginawa ninyo?)

A27. Tinanong ng nanay ko sa kanila, "Sir, sino ang pinatay?"

(My mother asked the policemen, "Sir, who was killed?")

Q28. What was the answer of the policemen?

(Ano ang sagot ng mga pulis?)

A28. Sinabi ng isa, hindi nila alam. Inaantay lang daw nila ang mga mag-iimbestiga. Sabi pa: "Hindi kami ang gumawa 'nun, pinagbantay lang kami."

(One of the policemen said, they don't know. They were just waiting for the investigators. They added: "We're not the ones who did it, we just stood guard.")

Q29. What happened next?

(Ano ang sumunod na nangyari?)

A29. Nag-iiyak na ang nanay ko doon. Sabi niya sa mga pulis, "Mga walang hiya kayo, pinatay niyo 'yung walang kasalanan!"

(My mother started crying. She told the policemen: "You have no shame, you killed someone who is innocent!")

Q30. What happened next?

(Ano ang sumunod na nangyari?)

A30. Nalaman namin sa mga pulis na dinala ang katawan ng tiyuhin ko sa ospital ng Sta. Ana. Pinayuhan kami 'nung tagarito na na-Tokhang din po ang kapatid na pumunta na kami agad sa ospital para hindi na lumaki ang gastos at para hindi na ipatubos. Kaya pumunta na po ang nanay ko kasama ng isang kamag-anak. Sumunod po ako sa ospital at inasikaso ang pag-release ng bangkay sa morge.

(We learned from the policemen that the body has been brought to Sta. Ana hospital. We were advised by a fellow resident whose sibling was also killed in Tokhang to quickly proceed to the hospital in order that our expenses would not balloon and we don't have to redeem the body. So my mother went together with another relative. I followed and arranged the release of the body from the morgue.)

Q31. You said that the policemen standing guard at the house of your Uncle Ramon mentioned that they were waiting for the investigator. Who are these investigators?

(Sinabi mo na nabanggit ng mga pulis na nagbabantay sa labas ng bahay ng iyong Tiyo Ramon na inaantay nila ang mag-iibestiga. Sino ang mga taong ito na mag-iibestiga?)

A31. Mga regular na pulis, hindi SOCO. May sasakyan na dumating bandang mag-uumaga na, may lulan na mga pulis, kumuha ng litrato tapos umalis na.

(Regular policemen, not SOCO. A vehicle arrived near daybreak, policemen alighted. They took pictures then they left.)

Q32. How did you know the investigators were regular policemen, not SOCO?

(Paano mo nalaman na ang mga imbestigador ay regular na pulis at hindi SOCO?)

A32. Kasi kapareho rin lang po sila ng mga nakabantay, pareho ang suot. Wala namang iba o espesyal na uniporme. Hindi rin sila nagtagal, nagpicture lang.

(Because they were similar to those who stood guard, same clothes. No different or special uniform. Also, they did not stay long, they just took pictures.)

Q33. Who do you think killed Ramon?

(Sino sa tingin mo ang pumatay kay Ramon?)

A33. 'Yung mga pulis din.

(We think the police.)

Q34. Why do you say that it is the police who killed your Uncle Ramon?

(Bakit ninyo nasabi na ang mga pulis din ang pumatay sa Tiyo Ramon mo?)

A34. Habang nangyayari 'yung pagsalakay sa tiyuhin ko nandoon na ang mga pulis na naka-uniporme, nakita ko. Nandoon ang mga pulis noong dumating kami sa bahay ni Tiyo Ramon. Hindi naman nila itinanggi na pulis ang pumatay. Wala namang paliwanag kung sino. Wala ring SOCO o ibang pulis na nakiugnay sa amin o nag-imbetiga pagkatapos.

(Police in uniform were already there when my uncle was being attacked. They were there when we arrived at the house of Uncle Ramon. They did not deny that police were the ones who killed my uncle. There was no explanation to us who was the perpetrator. No SOCO or other policemen coordinated with us or conducted any investigation after.)

Q35. Why do you think your Uncle Ramon was killed?

(Ano sa tingin mo, bakit pinatay ang iyong Tiyo Ramon?)

A35. Biktima po ang aking tiyuhin ng Tokhang, pero napagkamalan lang.

(My uncle was a mistaken victim of Tokhang.)

Q36. Why do you think your uncle was a mistaken victim of Tokhang?

(Bakit mo naisip na napagkamalan ang iyong tiyuhin?)

A36. Sabi ng isang tiyuhin ko na kakambal ni Tiyo Ramon na si Tiyo Emil, pagkatapos barilin ng mga lalaki si Tiyo Ramon sa loob ng bahay, narinig niyang sabi nila: "Mali, mali, hindi ito!"

(My other uncle and Uncle Ramon's twin brother Uncle Emil told us that after the men shot Uncle Ramon inside his house, he heard them exclaim, "Wrong, wrong, it's not this one!")

Q37. How was your Uncle Emil able to hear the men exclaim after they had shot Ramon?

(Paano narinig ni Emil ang sabi ng mga lalaki pagkatapos nilang barilin si Ramon?)

A37. Nakatira si Tiyo Emil sa kwarto sa likod ng bahay ni Tiyo Ramon. Isang pader lang ang pagitan nila. Nasa kwarto si Tiyo Emil nang pasukin at barilin ng mga lalaki si Tiyo Ramon sa loob ng bahay.

(Uncle Emil lives in a room connected at the back of Uncle Ramon's house. Only a wall separates them. Uncle Emil was home when the men barged inside Uncle Ramon's house and shot him.)

Q38. After your Uncle Ramon was killed, how do you feel?

(Matapos patayin ang iyong Tiyo Ramon, ano ang iyong pakiramdam?)

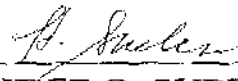
A38. Takot na takot po kami. Lalo na kasi panay ang ronda ng mga naka-bonet sa gabi. Noong pangatlong araw ng burol, may dumaan na mga naka-bonet na lalaki, sinusuyod ang mga eskinita. Kahit pagkatapos ng libing, nakikita ng mga kapitbahay ang mga lalaking rumoronda. Dito, tuloy-tuloy ang mga patayan.

(We are terrified. Especially because men in bonnets walk the streets at night. On the third day of the wake, there were men wearing bonnets who walked even through the narrow alleys. Even after the funeral, neighbors still see men making rounds. Here, the killings continue. It does not stop.)

PETITIONERS' COUNSEL: That is all for the witness, Your Honor.

IN WITNESS WHEREOF, I have hereunder affixed my signature this
____th day of ~~September~~ 2017.

16 OCT 2017



HAIDEE O. SUELEN
Affiant

SUBSCRIBED AND SWORN TO before me this ¹⁶ ~~16~~ OCT 2017 day of
~~September~~ 2017 in _____, affiant
appearing before me and presenting the foregoing Judicial Affidavit,
showing and presenting to me her Manila Health Care System
bearing the number A-189134 valid until
_____ and taking an oath before me as to the said
document.

IN WITNESS WHEREOF, I have hereunder affixed my signature.



JESSICA ANNE G. CO
Notary Public for Makati City
Until December 31, 2018
Appointment No. M-455
Roll No. 65444
IBP No. 014819 / Lifetime
PTR No. 5919754/ Jan. 11, 2017 - Makati
1904 Antel Corporate Centre, 121 Valero St.
Salcedo Village, Makati City

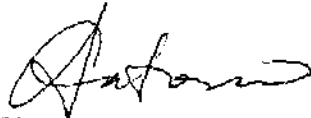
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Page No. 19
Book No. 1
Series of 2017.

ATTESTATION

I, **CRISTINA I. ANTONIO**, with office address at 1105 Antel Corporate Center, 121 Valero Street, Salcedo Village, Makati City hereby attest to the following:

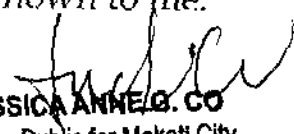
1. I faithfully recorded the questions I asked and the corresponding answers that the affiant/witness gave;
2. No person then present or assisting us coached the witness regarding the latter's answers.

Makati City, ___ ___ October 2017.



CRISTINA I. ANTONIO

SUBSCRIBED AND SWORN to before me this 06th day of October, 2017 by affiant who is personally known to me.



JESSICA ANNE G. CO
Notary Public for Makati City
Until December 31, 2018
Appointment No. M-455
Roll No. 65444

IBP No. 014819 / Lifetime
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