

JUDICIAL AFFIDAVIT OF PAZ R. OREGAS

The judicial affidavit of the witness was taken and recorded at the office of Center for International Law (Centerlaw) - Philippines, located at 1104 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 Paz R. Oregas for the purpose of proving the following:

1. She is one of the Petitioners in the instant case;
2. She is the sister of Ramon Rodriguez, who was shot and killed inside his house on 10 June 2017 at around 2:00 in the morning;
3. She saw the perpetrators in face masks and civilian clothes on the street to the shooting of Ramon Rodriguez inside his house;
4. She saw the dead body of Ramon Rodriguez being taken away by the perpetrators;
5. The police stationed at the Police Community Precinct in Dagonoy St., San Andres Bukid, Manila, which are 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;
6. Because of the killing of her brother 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 (MPD) 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;

7. 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 Paz R. Oregaz, 67 taong gulang, Pilipino at nakatira sa 2346 Arellano St., Sta. Ana Manila.

(I am Paz R. Oregaz, 67 years old, Filipino and a resident of 2346 Arellano St., Sta. Ana Manila.)

Q2. What is your work?

(Ano ang iyong trabaho?)

A2. Nagtitinda po ako sa labas ng aming bahay ng balot.

(I sell "balot" eggs outside our house.)

Q3. 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?)

A3. Ako po ay nasa loob ng aming bahay.

(I was inside our house.)

Q4. 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?)

A4. Ang aking anak na si Haidee Suelen, ang asawa niya at mga apo ko.

(My daughter, Haidee Suelen, her husband, and my grandchildren.)

Q5. What were you doing at that time?

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

A5. Napabangon po ako dahil sa malakas na tahol ng mga aso. May narinig din po ako na parang komosyon sa kalye sa labas ng bahay namin.

(I was roused by the loud barking of dogs. I also heard what seemed to be a commotion on the street outside our house.)

Q6. Having heard the barking of dogs and the commotion outside, what did you do?

(Nang marinig ninyo ang tahol ng mga aso at komosyon sa labas, ano ang ginawa ninyo?)

A6. Lumabas ako ng bahay at sumilip sa pagitan ng mga rehas na bakal ng gate namin.

(I went out of the house door and peeped through the steel bars of our gate.)

Q7. Peeping through the gate, what did you see?

(Nang sumilip ka sa gate, ano ang iyong nakita?)

A7. Nakita ko ang maraming lalaki sa kalye. Malalaki ang mga katawan nila, at may suot silang mask sa mukha. Mga lampas sampu (10) sila.

(I saw many men on the street. They were burly, and they wore masks over their faces. They were more than ten (10).)

Q8. What were the masked men doing?

(Ano ang ginagawa ng mga lalaking naka-mask?)

A8. Naglalakad sila paroo't parito. Ilan sa kanila may hawak na flashlight. Itinututok nila 'yung ilaw sa mga bahay at bintana at sinisigaw "Walang titingin, walang lalabas!"

(They were walking around. Some of them bore flashlights. They trained them on the houses and windows while shouting: "Don't look, don't go out!")

Q9. After seeing the masked men with flashlights, what did you do?

(Nang makita mo ang mga lalaking naka-mask na may mga flashlight, ano ang ginawa mo?)

A9. Sa matinding takot ko po, dali-dali akong bumalik sa loob ng bahay.

(Terrified, I very quickly went back inside the house.)

Q10. Inside the house, what did you do?

(Sa loob ng bahay, ano ang iyong ginawa?)

A10. Nakiramdam po ako sa nangyayari sa labas.

(I tried to sense what was going on outside)

Q11. What did you sense?

(Ano ang iyong napakiramdaman?)

A11. Nagpatuloy ang ingay at komosyon sa labas. May narinig akong malalakas na kalabog, malalakas na ingay.

(The noise and commotion continued outside. I heard loud banging, loud noises.)

Q12. What were you thinking while you were listening to the noise and commotion outside?

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

A12. Iniisip ko kung ano kaya ang ginagawa ng mga lalaking naka-mask. Dahil sa mga kalabog, naisip ko na may pinapasok silang bahay at may hinahanap. Pero hindi ko naisip na kapatid ko na pala 'yung hinahanap.

(I was wondering what the masked men were doing. Because of the loud banging, it occurred to me that the men were forcibly entering a house and looking for someone. But it didn't occur to me that it was my brother they were looking for.)

Q13. You mentioned your brother. Who is he?

(Nabanggit mo ang iyong kapatid. Sino siya?)

A13. Siya po si Ramon Rodriguez. Isa po siya tagagawa ng susi at tagakumpuni ng sapatos. Nakatira po siya sa malapit sa amin. Siya na pala ang pinasok at pinatay ng mga lalaking naka-mask na nakita ko sa labas ng bahay namin.

(He is Ramon Rodriguez. He makes keys and repairs shoes for a living. He lives near us. He was the person assaulted inside his house and killed by the masked men I saw outside our house)

Q14. How did you know that your brother Ramon was the one assaulted?

(Paano ninyo nalaman na ang kapatid ninyong si Ramon ang pinasok?)

A14. Ilang minuto pagkatapos kong pumasok sa loob ng bahay, bumaba ang apo ko na nasa balkonahe. Ang sabi sa akin, ang bahay ni Ramon ang puwersahang pinapasok ng mga lalaki.

(A few minutes after I went back inside the house, my nephew who was at the balcony at the second floor came down. He told me that it

is the house of Ramon that was being forcibly broken into by the men.)

Q15. What did you do next?

(Ano ang sumunod mong ginawa?)

A15. Kabadong kabado ako, pero pumunta ako sa balkonahe para tingnan.

(I was very frightened, but I went up the balcony to take a look.)

Q16. What did you do next?

(Ano ang sumunod mong ginawa?)

A16. Dala ng takot, nanatili ako, ang anak kong si Haidee at mga apo ko sa loob ng bahay. Nang tahimik na, lumabas kami ni Haidee ng bahay.

(Out of fear, my daughter Haidee, my grandchildren and I stayed inside the house. When everything was quiet, Haidee and I went out of the house.)

Q17. What happened next?

(Ano ang sumunod na nangyari?)

A17. Pagtingin namin sa kahabaan ng kalye, natanaw namin sa malayo ang ilang lalaki paliko sa isang kanto. Parang may buhat-buhat sila.

(Looking down the street, we saw at a far distance men turning at an intersection. They seemed to be carrying something.)

Q18. What did you feel when you caught that sight?

(Ano ang iyong naramdaman nang matanaw mo iyon?)

A18. Takot na takot ako... Nakaramdam din ako ng masamang kutob tungkol sa aking kapatid na si Ramon.

(I was terrified. I also felt a horrible premonition about my brother Ramon.)

Q19. What did you do next?

(Ano ang sumunod mong ginawa?)

A19. Nanginginig ako sa takot, pero naglakad kami ni Haidee papunta sa bahay ni Ramon ilang metro ang layo mula sa amin.

(Shaking with fear, Haidee and I walked to the house of Ramon a few meters away from our house.)

Q20. What did you see?

(Ano ang nakita ninyo?)

A20. Nang malapit na kami, may nakita kaming tatlong pulis na nakatayo sa may poste sa kalye tapat ng bahay ni Ramon.

(When we were near, we saw three policemen standing beside an electric post on the street across Ramon's house.)

Q21. How did you know they were policemen?

(Paano ninyo nalaman na mga pulis sila?)

A21. Naka-uniporme sila ng pulis. Namukhaan ko rin sila bilang mga pulis na madalas nakabantay sa presinto sa Dagonoy Street sa San Andres Bukid.

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

Q22. Upon seeing the policemen, what did you do?

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

A22. Dahil pakiramdam ko may masamang nangyari kay Ramon, nangahas akong tanungin sa mga pulis, "Sir, sino ang pinatay?"

(Feeling something terribly wrong had befallen Ramon, I dared ask the policemen, "Sir, who was the one killed?")

Q23. What was the answer of the policemen?

(Ano ang sagot ng mga pulis?)

A23. Sinabi ng isa: "Responde lang kami, hinihintay namin 'yung imbestigador dahil dinala 'yung bangkay sa ospital."

(One of the policemen said: "We just responded, we're waiting for the investigator because he brought the body to the hospital.")

Q24. What was your reply?

(Ano ang sagot ninyo?)

A24. Hindi ko napigilan ang sarili ko, nagsisigaw na ako: "Ay bakit aantayin pa ang imbestigador? Sino'ng iimbestigahan, e kinuha 'nyo na 'yung kapatid ko! Bakit 'nyo pinatay ang kapatid ko e hindi naman adik 'yun! Ipalibing niyo 'yan, ipalibing 'nyo 'yan, ano'ng ipapanlibing ko diyan!"

(I could not hold my composure, I started shouting: "Why wait for the investigator? Who will you investigate, you've already taken my brother away! Why did you kill my brother, he is not an addict! You bury him, you bury him, with what money will I bury him?")

Q25. What happened next?

(Ano ang sumunod na nangyari?)

A25. Nang kumalma na po ako, tinanong namin kung nasaan ang kapatid ko na si Ramon.

(When I had calmed down, we asked where my brother Ramon was brought.)

Q26. What did the policemen say?

(Ano ang sabi ng mga pulis?)

A26. Sabi nila dinala 'yung katawan sa ospital ng Sta. Ana.

(They said the body was brought to Sta. Ana hospital.)

Q27. What did you do next?

(Ano ang sumunod mong ginawa?)

A27. Pumunta na kami sa ospital ng Sta. Ana.

(We proceeded to Sta. Ana hospital.)

Q28. What happened next?

(Ano ang sumunod na nangyari?)

A28. Noong dumating kami sa ospital, nahanap naming 'yung imbestigador na binanggit ng tatlong pulis.

(When we arrived at the hospital, we found the investigator mentioned by the three policemen.)

Q29. And then, what happened?

(Pagkatapos, ano'ng nangyari?)

A29. Tanong ng imbestigador: "Ano ang pangalan ng hinahanap 'nyo?"

(The investigator asked, "What is the name of the person you are looking for?")

Q30. What was your response?

(Ano ang iyong sagol?)

A30. Sabi ko hinahanap namin ang kapatid ko na si Ramon Rodriguez.

(I told him we were looking for my brother Ramon Rodriguez.)

Q31. What did the investigator say in response?

(Ano ang tugon ng imbestigador?)

A31. Sabi niya, "Kung gusto 'nyo, tingnan 'nyo sa morgue."

(He said, "If you like, go look at the morgue.")

Q32. What was your reaction?

(Ano ang reaksiyon mo?)

A32. Sobra po akong kinilabutan. Sabi ko hindi ko kayang pumasok sa morgue.

(I was filled with dread. I told him I can't go inside the morgue.)

Q33. What happened next?

(Ano ang sumunod na nangyari?)

A33. Ipinakita ng imbestigador ang cellphone niya sa akin. Sa screen ng cellphone, may larawan ng bangkay. Nakilala ko ang bangkay bilang kapatid kong si Ramon.

(The investigator showed me his cellphone. On the screen of the cellphone was a picture of a dead body. I recognized the body as that of my brother Ramon.)

Q34. When you saw ng picture of your dead brother, what did you do?

(Nang makita mo ang larawan ng bangkay ng iyong kapatid, ano ang ginawa mo?)

A34. Nagsisigaw at nag-iiyak ako. Isinisigaw ko: "Bakit 'nyo pinatay?! Walang kasalanan ang kapatid ko, hindi naman adik 'yun, gumagawa lang 'yan ng susi at sapatos!"

(I broke down screaming and crying. I shouted, "Why did you kill him? My brother has not done anything wrong, he is not an addict, he just makes keys and shoes!")

Q35. What was the reaction of the investigator?

(Ano ang reaksiyon ng imbestigador?)

A35. Walang reaksiyon. Hindi kami pinapansin.

(No reaction. He did not pay us any mind.)

Q36. What did you do next?

(Ano ang sumunod mong ginawa?)

A36. Inayos namin ni Haidee ang pagtubos sa bangkay ni Ramon sa morgue. Dinala naming ang katawan sa Ilagan funeral parlor.

(Haidee and I arranged the release of Ramon's body from the morgue. We brought the body to Ilagan funeral parlor.)

Q37. Who do you think killed Ramon?

(Sino sa tingin mo ang pumatay kay Ramon?)

A37. Tingin po naming 'yung mga pulis din.

(We think the police themselves.)

Q38. Why do you say that it is the police themselves who killed Ramon?

(Bakit ninyo nasabi na ang mga pulis din ang pumatay kay Ramon?)

A38. Nandoon na po ang mga pulis noong dumating kami sa bahay ni Ramon. Hindi naman nila itinanggi na pulis ang pumatay; 'yung mga pulis at imbestigador wala namang sinabi na iba ang pumatay kay Ramon. Wala namang patiwanag. Wala ring SOCO na dumating. Walang ibang pulis na nakiugnay sa amin o nag-imbestiga pagkatapos.

(The police were already there when we arrived at the house of Ramon. They did not deny that police were the ones who killed; the three policemen and the investigator did not tell us that another

person killed Ramon. There was no explanation. No SOCO arrived. No other policemen coordinated with us or conducted any investigation after.)

Q39. Why do you think Ramon was killed?

(Ano sa tingin ninyo, bakit pinatay si Ramon?)

A39. Tingin ko biktima si Ramon ng Tokhang. Pinagkamalan siya bilang 'yung tulak dito sa amin na nakatira sa kabilang eskinita.

(I think Ramon was the victim of Tokhang. He was mistaken for the pusher here in our neighborhood who lives in the other alley.)

Q40. Why do you think Ramon was mistaken for someone else?

(Bakit mo naisip na napagkamalan si Ramon?)

A40. Sabi ng isa pang kapatid ko na kakambal ni Ramon na si Emil, pagkatapos barilin ng mga lalaki si Ramon sa loob ng bahay, narining niyang sabi nila: "Mali, mali, hindi ito!"

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

Q41. How was 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?)

A41. Nakatira si Emil sa kwarto sa likod ng bahay ni Ramon. Isang pader lang ang pagitan nila. Nasa kwarto si Emil nang pasukin at barilin ng mga lalaki si Ramon sa loob ng bahay.

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

Q42. After your brother Ramon was killed, how do you feel now?

(Matapos patayin ang iyong kapatid na si Ramon, ano ang iyong pakiramdam ngayon?)

A42. Takot na takot po kami, lalo na dahil sunod-sunod ang patayan. I hindi tumitigil. Kapag pagabi na, pumapasok na kami ng bahay at pina-padlock ang gate. Takot kaming lumabas sa gabi. Wala nang ligtas dito sa amin. HBindi po naming alam ang gagawin.

(I feel very scared, especially because the killings continue one after the other. In the late afternoon, we already go inside the house and padlock the gate. We are afraid to go out at night. No one is safe here. We don't know what to do.)

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

Pa. R. Oregas

PAZ R. OREGAS

Affiant

✕ SUBSCRIBED AND SWORN TO before me this 16 OCT 2017 day of ~~September~~ 2017 in MAKATI CITY affiant appearing before me and presenting the foregoing Judicial Affidavit, showing and presenting to me her OSCA bearing the number 123575 valid until _____ and taking an oath before me as to the said document.

IN WITNESS WHEREOF, I have hereunder affixed my signature.

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Book No. 1
Series of 2017

Jessica Anne G. Co
JESSICA ANNE G. CO
Notary Public for Makati City
Until December 31, 2018
Appointment No. M-456
Roll No. 65444
IBF No. 014819 / Lifetime
PTR No. 5919754 / Jan. 11, 2017 - M-
1904 Antel Corporate Centre, 121st St.
Salcedo Village, Makati

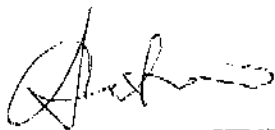
ATTESTATION

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, ^{16 OCT 2017} 16 October 2017.



CRISTINA I. ANTONIO

~~September~~ ^{16 OCT 2017} SUBSCRIBED AND SWORN to before me this 16 day of October 2017 by affiant who is personally known to me.

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