

Republic of the Philippines

Judicial Region

TRIAL COURT
Branch _____, _____, _____

REPUBLIC OF THE PHILIPPINES,

Complainant,

-versus-

CRIMINAL CASE NO. _____

FOR: _____

_____,

Accused.

X -----X

COMPLAINT

The undersigned, _____, accuses _____ of the crime of **ABDUCTION**, committed as follows, to wit:

That on or about _____, at about _____ (a.m./p.m.), in the City/Municipality of _____, Province of _____ and within the jurisdiction of this Honorable Court, the said accused, did then and there willfully, unlawfully and feloniously abduct a woman named _____ who is a minor of 14 years while she was on her way home from school, taking and carrying her away on board a black passenger van, against her will and **with** lewd designs.

Contrary to law.

_____, Philippines, Date .

COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME, A Notary public in and for the City of Puerto Princesa and the Province of Palawan this 24th day of October 2013. Affiant personally came and appeared with Driver’s License ID No. issued by the Land Transportation Office and valid until May 1, 2015, at Puerto Princesa City, bearing his photograph and signature, known to me as the same person who personally signed the foregoing instrument before me and avowed under penalty of law to the whole truth of the contents of said instrument

Notary Public

Doc. No. _____;

Page No. _____;

Book No. _____;

Series of 20__;

Witnesses:

