



Republic of the Philippines
COMMISSION ON ELECTIONS
Intramuros, Manila

Complainant,
- versus -

Respondent.
x-----x

For: Violation of Section 261 (o)
of the Omnibus Election Code
(Use of Public Funds, Money
Deposited in Trust, Equipment,
Facilities Owned or Controlled by
the Government for an Election
Campaign)

COMPLAINT

I _____, herein Complainant, is of
legal age and a resident of _____
after having been
sworn to in accordance with law depose and states that:

1. Respondent _____, is of legal age and
a resident of _____;
(narration of detailed information of the respondent.)

2. On _____, Respondent/s unlawfully used public
funds, equipment and facilities in violation of Section 261 (o) of the
Omnibus Elections Code (OEC), as follows:

(narration of detailed circumstances of the allegation/complaint, with reference to evidence with assigned Annexes. The narration of facts shall be based on personal knowledge / acts which are personally witnessed by Complainant/s.)

The _____
is/are hereto attached as Annex "A". *(title or description of referred evidence)*

3. Section 261 (o) of the OEC reads:

Section 261. Prohibited acts. The following shall be guilty of an election offense:

(o) Use of public funds, money deposited in trust, equipment, facilities owned or controlled by the government for an election campaign. - Any person who uses under any guise whatsoever, directly or indirectly, (1) public funds or money deposited with, or held in trust by, public financing institutions or by government offices, banks, or agencies; (2) any printing press, radio, or television station or audio-visual equipment operated by the Government or by its divisions, sub-divisions, agencies or instrumentalities, including government-owned or controlled corporations, or by the Armed Forces of the Philippines; or (3) any equipment, vehicle, facility, apparatus, or paraphernalia owned by the government or by its political subdivisions, agencies including government-owned or controlled corporations, or by the Armed Forces of the Philippines for any election campaign or for any partisan political activity.

4. Clearly, when Respondent/s committed the act of _____, it is evident that all the elements of the offense under Section 261 (o) are present, particularly that public funds / equipment/ facilities were used for election campaign;

5. Such willful and unlawful use of public funds / equipment/ facilities are considered abuse of state resources in elections that undermines the electoral system which is detrimental to democratic governance;

6. Therefore, in view of the foregoing, I am executing this Complaint to attest to the truth of the facts stated herein and for

purposes of filing an election offense case against the Respondent/s
for violation of Section 261 (o) of the OEC.

IN WITNESS WHEREOF, I hereunto affix my signature this
_____ at _____.

Name and Signature of Complainant
(Address and Contact Details)

SUBSCRIBED AND SWORN TO before me, this _____
at _____, Affiant exhibiting to me an identification
document/card which contains a photograph and signature bearing No.
_____, issued by _____.

Doc. No. _____;
Page No. _____;
Book No. _____;
Series of _____.