

**Cour  
Pénale  
Internationale**



**International  
Criminal  
Court**

Original: **English**

No.: **ICC-01/21-01/25**  
Date: **13 February 2026**

**PRE-TRIAL CHAMBER I**

**Before:**                    **Judge Iulia Antoanella Motoc, Presiding Judge**  
                                  **Judge Reine Adélaïde Sophie Alapini-Gansou**  
                                  **Judge María del Socorro Flores Liera**

**SITUATION IN THE REPUBLIC OF THE PHILIPPINES**

**IN THE CASE OF *THE PROSECUTOR* v. *RODRIGO ROA DUTERTE***

**Public**

**Public Lesser Redacted Version of “Document Containing the Charges”, 4 July 2025,  
ICC-01/21-01/25-178-Conf**

**Source:**                    **Office of the Prosecutor**

Document to be notified in accordance with regulation 31 of the *Regulations of the Court* to:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> The Office of the Prosecutor         | <input checked="" type="checkbox"/> Counsel for the Defence                     |
| <input checked="" type="checkbox"/> Legal Representatives of the Victims | <input type="checkbox"/> Legal Representatives of the Applicants                |
| <input type="checkbox"/> Unrepresented Victims                           | <input type="checkbox"/> Unrepresented Applicants<br>(Participation/Reparation) |
| <input type="checkbox"/> The Office of Public Counsel for Victims        | <input type="checkbox"/> The Office of Public Counsel for the Defence           |
| <input type="checkbox"/> States' Representatives                         | <input type="checkbox"/> Amicus Curiae  |

## REGISTRY

---

- |  |  |
|--|--|
| <b>Registrar</b><br>M. Osvaldo Zavala Giler                            | <input type="checkbox"/> Counsel Support Section |
| <input type="checkbox"/> Victims and Witnesses Unit                    | <input type="checkbox"/> Detention Section       |
| <input type="checkbox"/> Victims Participation and Reparations Section | <input type="checkbox"/> Other                   |

The Prosecution submits this Document Containing the Charges (“DCC”) pursuant to Pre-Trial Chamber I’s order (ICC-01/21-01/25-114) and charges Rodrigo Roa DUTERTE (“DUTERTE”) with the crimes against humanity set out below.

## **I. THE SUSPECT: RODRIGO ROA DUTERTE**

1. DUTERTE was born on 28 March 1945 in Maasin, Southern Leyte, the Republic of the Philippines (“Philippines”). He is a national of the Philippines. For much of the period 1988 to 2016, DUTERTE was Mayor of Davao City. During the period 1 November 2011 to 16 March 2019 (“the charged period”), DUTERTE was: Vice Mayor of Davao City (from 1 November 2011 to 30 June 2013); Mayor of Davao City (from 30 June 2013 to 30 June 2016) (together, the “Mayoral period”); and President of the Philippines (from 30 June 2016 to 16 March 2019, the “Presidential period”).

## **II. CONFIDENTIALITY**

2. Pursuant to regulation 23bis(1) of the Regulations of the Court, this DCC is filed as confidential as it contains sensitive information pertaining to the security of victims and witnesses. A public redacted version will be filed as soon as practicable.

## **III. THE CHARGES**

### **A. DUTERTE’S INDIVIDUAL CRIMINAL RESPONSIBILITY**

#### **1. Indirect co-perpetration (article 25(3)(a))**

3. DUTERTE is individually criminally responsible pursuant to article 25(3)(a) of the Rome Statute for the crimes charged in **Counts 1 to 3** as he committed them as an indirect co-perpetrator.

4. At least between 1 November 2011 and 16 March 2019, DUTERTE and his co-perpetrators shared a common plan or agreement to ‘neutralise’ alleged criminals in the Philippines (including those perceived or alleged to be associated with drug use, sale or production) through violent crimes including murder (“Common Plan”). The members of the Common Plan (together, including DUTERTE: “the Co-Perpetrators”), each for at least part of the charged period, included some or all of the following:

- a. Ronald ‘Bato’ DELA ROSA (“DELA ROSA”): Mayoral period: Chief of Davao City Police (January 2012-October 2013); Presidential period: Chief of the Philippine National Police (“PNP”) (July 2016-April 2018);
- b. Vicente DANAÑO (“DANAÑO”): Mayoral period: Chief of Davao City Police (October 2013-June 2016); Presidential period: Counterintelligence Chief, PNP Directorate for Intelligence in PNP National Headquarters (July 2016-February 2017); Chief of Directorial Staff and then Deputy Director for Operations of the PNP Criminal Investigation and Detection Group (February 2017-November 2018); Manila Police District Director (November 2018-October 2019);
- c. Camilo CASCOLAN (“CASCOLAN”): Mayoral period: Finance Chief of Davao Region Police Office (2011-2012); Presidential period: Chief of the PNP Directorate for Operations (July 2016-April 2018); Regional Director of the National Capital Region Police Office (“NCRPO”) (April-May 2018); Chief of Staff in the PNP Office of the Chief of Directorial Staff (September 2018-October 2019);
- d. Oscar ALBAYALDE (“ALBAYALDE”), who joined the Common Plan only in the Presidential period: Regional Director of the NCRPO (July 2016-April 2018); Chief of the PNP (April 2018-October 2019);
- e. Christopher Lawrence ‘Bong’ GO (“Bong GO”): Mayoral period: DUTERTE’s Personal Aide and Special Assistant (1998-2016); Presidential period: DUTERTE’s Special Assistant and Chief of the Presidential Managerial Staff (June 2016-October 2018);
- f. Dante GIERRAN (“GIERRAN”): Mayoral period: Davao Regional Director of the National Bureau of Investigation (“NBI”) (2013–2016); Presidential period: Director of the NBI (2016-2020);
- g. Isidro LAPENÑA (“LAPENÑA”): Prior to the charged period: Davao City Police Chief (1996-1998); Presidential period: Chief of the Philippine Drug Enforcement Agency (“PDEA”) (2016-2017);

- h. Vitaliano AGUIRRE II (“AGUIRRE”): Mayoral period: lawyer for DUTERTE and other members of the Davao Death Squad (“DDS”); Presidential period: Secretary of Justice of the Philippines (July 2016-April 2018); and
- i. other members of the PNP and high-ranking government officials.

5. During the Mayoral period, DUTERTE, Bong GO and the above-mentioned law enforcement officials used police from Davao City and non-police hitmen (together, the DDS) to kill alleged criminals. By means of their *de jure* and/or *de facto* authority, one or more of the Co-Perpetrators controlled a structure of power—the local police and related DDS hierarchy—that enabled them to control the will of the physical perpetrators. As Mayor, DUTERTE sat at the apex of the formal police and city structures, with legal control over the PNP units in Davao City, as well as of non-police Davao City Hall workers and *barangay* (the smallest political and administrative unit in the Philippines) officials who sometimes participated in or facilitated the crimes. The DDS followed a similarly hierarchical structure with DUTERTE at the top, as the Head of the DDS. At the bottom were the DDS members who physically carried out the crimes (generally non-police hitmen or low-level police), who were subordinated to police or *barangay* handlers. The handlers reported to a combination of police and Co-Perpetrators (in particular, DELA ROSA (2012-2013), DANA O (2013-2016), Sonny BUENAVENTURA (police officer and DUTERTE’s driver and bodyguard) and Bong GO), who in turn reported to DUTERTE. DUTERTE’s approval was required for DDS members to conduct killings in Davao City.

6. DUTERTE and his Co-Perpetrators used the DDS, including its low-level members, as tools to commit the crimes encompassed by the Common Plan. Those who did not follow orders risked being killed and were disposed of when perceived as opposing or posing a threat to the Common Plan, however insignificant. The Co-Perpetrators’ power over the physical perpetrators was such that the latter felt they had no choice but to obey. The Co-Perpetrators recruited individuals they could trust and control for the DDS, with DUTERTE personally inducting some DDS hitmen. They also maintained control by recruiting some physical perpetrators in circumstances in which they owed a debt to DUTERTE and/or the police. DDS physical perpetrators were fungible within the apparatus.

7. During DUTERTE’s presidential campaign and the transition period after he was elected, the Co-Perpetrators agreed to expand the Common Plan to ‘neutralise’ alleged criminals through violent crimes including murder across the Philippines. When DUTERTE became

President on 30 June 2016, he had *de jure* and *de facto* control over the PNP, PDEA and all other agencies implementing the Common Plan nationwide. Immediately after his inauguration, DUTERTE appointed Co-Perpetrators from Davao City to high-level national positions which allowed them to exercise control over the physical perpetrators, for example: DELA ROSA became PNP Chief; LAPENÑA became Director General of PDEA; Bong GO became DUTERTE's Presidential Special Assistant and Chief of Staff; GIERRAN became Director of the NBI nationwide; and AGUIRRE became Secretary of Justice of the Philippines. Together, DUTERTE and his Co-Perpetrators established a network of perpetrators comprising State actors such as law enforcement officers (including personnel from the PNP, PDEA, the NBI and the Bureau of Corrections ("BuCor")), non-police assets and hitmen (together, "the National Network"), to operate in a similar manner as the DDS in conducting operations to kill alleged criminals in accordance with the Common Plan.

8. During the Presidential period, DUTERTE and his Co-Perpetrators used the National Network, including its low-level members, as tools to commit the crimes encompassed by the Common Plan. In their new geographically expanded roles, the Co-Perpetrators controlled the will of the physical perpetrators through a mechanism that ensured their automatic compliance with their orders. This mechanism relied upon the Co-Perpetrators' authority over the physical perpetrators through: the chains of command; the recruitment of persons who were loyal and they knew they could control (including subordinates who were already notorious for their involvement in killings in the Davao region to other parts of the country); threats and use of violence to ensure compliance; making use of circumstances in which they could hold something over their subordinates; the supervision and reporting of the operations; and payments and other incentives to the physical perpetrators. As with the DDS in Davao City, the physical perpetrators were fungible within the apparatus and those who did not follow orders risked being killed when perceived as opposing or posing a threat to the Common Plan.

9. Within the framework of the Common Plan, DUTERTE made an essential contribution to the crimes in **Counts 1 to 3** by:

- a. Designing and disseminating the policy to 'neutralise' alleged criminals (both in his role as Mayor of Davao City, and also during his Presidential campaign and as President), including by endorsing the anti-illegal drugs campaign 'Double Barrel';
- b. Establishing and overseeing the DDS;

- c. Instructing and authorising violent acts including murder to be committed against alleged criminals, including alleged drug dealers and users;
- d. Providing personnel and other necessary logistical resources such as weapons including those to be used in the execution of the crimes;
- e. Appointing key personnel to positions which were crucial to the execution of the crimes;
- f. Offering financial incentives and promotions to police officers and hitmen to kill alleged criminals;
- g. Creating and maintaining a system in which perpetrators knew they would be protected, including through promises of immunity and shielding perpetrators from investigation and prosecution;
- h. Making public statements authorising, condoning and encouraging killings of alleged criminals, both as Mayor of Davao City and President of the Philippines;
- i. Authorising State actors to take part in the anti-drugs campaign and temporarily revoking such authorisation, including to placate public outcry;
- j. Publicly naming individuals and holding up charts from lists of alleged criminals, including so-called 'high-value targets', some of whom were subsequently killed.

10. DUTERTE meant to engage in the charged conduct, and intended, or was aware that violent crimes including murder would be committed in the ordinary course of events as a result of the implementation of the Common Plan. DUTERTE was aware that the Common Plan involved an element of criminality and was aware of the fundamental features of the DDS and the National Network which enabled him to exercise control over the charged crimes together with his Co-Perpetrators. DUTERTE was also aware of the factual circumstances which allowed him to have joint control over the crimes, together with his Co-Perpetrators.

## **2. Ordering and/or inducing (article 25(3)(b))**

### *a. Ordering*

11. DUTERTE ordered members of the DDS and the National Network, over whom he had authority as Mayor of Davao City and Head of the DDS, and later, President of the Philippines, to commit the crimes in **Counts 1 to 3** through the conduct described in paragraph 9 above. One or more of these members carried out DUTERTE's orders, which led to the commission of the crimes in **Counts 1 to 3**.

12. DUTERTE meant to engage in this conduct and was aware of his position of authority over the physical perpetrators of the crimes. He intended that violent crimes including murder would be committed or was aware that they would be committed in the ordinary course of events as a result of the implementation of the orders.

### *b. Inducing*

13. DUTERTE induced members of the DDS and the National Network to commit the crimes in **Counts 1 to 3** through the conduct described in paragraph 9 above. DUTERTE exerted influence over the members of the DDS and the National Network, prompting them to commit the relevant crimes.

14. DUTERTE meant to engage in the conduct described above. DUTERTE intended that, as a result of his conduct, violent crimes including murder would be committed or was aware that they would be committed in the ordinary course of events.

## **3. Aiding and abetting (article 25(3)(c))**

15. DUTERTE aided, abetted or otherwise assisted members of the DDS and the National Network to commit the crimes in **Counts 1 to 3** through the conduct described in paragraph 9 above. By these acts, DUTERTE facilitated and/or provided moral encouragement for the relevant crimes.

16. DUTERTE meant to engage in the relevant conduct and did so with the purpose of facilitating the commission of such crimes. DUTERTE was aware that members of the DDS and the National Network would, in the ordinary course of events, commit the types of crimes charged, and was aware that his conduct would contribute to their commission.

## **B. CONTEXTUAL ELEMENTS OF ARTICLE 7**

17. From at least 1 November 2011 to 16 March 2019, the DDS and/or the National Network carried out a widespread and systematic attack against the civilian population in the Philippines. From 1 November 2011 until DUTERTE became President of the Philippines on 30 June 2016, the attack was primarily concentrated in Davao City. After this, from at least 30 June 2016 to 16 March 2019, the attack expanded across the Philippines.

18. During the Mayoral period, the attack was carried out predominantly by the Davao City police and paid non-police hitmen who together comprised the DDS. During the Presidential period, the attack was carried out by the National Network (predominantly law enforcement personnel with non-police assets and hitmen under their direction and/or control).

19. The attack comprised multiple acts contrary to article 7(1) of the Rome Statute (amounting to a course of conduct) directed against the civilian population of the Philippines, including but not limited to the 76 murders and two attempted murders charged in this DCC, as well as at least hundreds of other murders during the Mayoral period, thousands of other murders in the Presidential period, and other violent crimes under article 7(1).

20. The attack was carried out pursuant to a State policy to 'neutralise' through violent crimes, including murder, alleged criminals in the Philippines who were perceived or alleged to be involved in drug-related (including production, sale and use) and other crimes (such as theft and murder). The policy was originally developed by DUTERTE and his close (mostly police) associates in Davao City and implemented at the local level, and then expanded to the national level in 2016.

21. In the alternative, the attack was carried out during the Mayoral period pursuant to the DDS's organisational policy to 'neutralise' through violent crimes, including murder, alleged criminals in the Philippines who were perceived or alleged to be involved in drug-related (including production, sale and use) and other crimes (such as theft and murder), which became a State policy in the Presidential period. At the material times, and consistent with but not limited to the characteristics set out in paragraphs 5 and 6 above, the DDS had structures or mechanisms that were sufficiently efficient to carry out the attack.

22. The attack was widespread. It was carried out on a large scale and frequent basis, victimising a significant number of civilians over a broad geographic area and a prolonged period of time. During the Mayoral period, it occurred in Davao City for a period of more than

four years. During the Presidential period, the attack expanded to locations across the Philippines for a period of almost three years. The attack included thousands of killings, which were perpetrated consistently throughout the charged period.

23. The attack was also systematic in that it was planned, organised and executed in a coordinated fashion, with the acts perpetrated in a clear pattern of violence directed at the targeted population.

24. The conduct that forms the basis of these charges was committed as part of this widespread and systematic attack against a civilian population. DUTERTE and/or the DDS and the National Network perpetrators knew and intended that their conduct was part of this attack.

### **C. THE CHARGED CRIMES**

25. The Prosecution charges the murders and attempted murders below, although the actual scale of victimisation during the charged period was significantly greater, as reflected in the widespread nature of the attack.

#### ***a. Count 1: Murders in or around Davao City during the Mayoral period by the DDS***

26. The murders in **Count 1**, as set out in Incidents 1 to 9 below, were perpetrated by members of the DDS in or around Davao City between 2013 and around June 2016 while DUTERTE was Mayor of Davao City (with formal operational supervision and control over Davao City police) and Head of the DDS. The victims of **Count 1** were each alleged to be criminals, such as drug pushers or thieves. The physical perpetrators of the murders in **Count 1** meant to cause the victims' deaths or were aware that their deaths would occur in the ordinary course of events.

27. **Incident 1:** In or around 2013, members of the DDS [REDACTED] killed three alleged drug pushers, all First Name Unknown ("FNU") Last Name Unknown ("LNU"), in or around [REDACTED], Davao City. The three victims [REDACTED].

28. **Incident 2:** In or around 2013, members of the DDS [REDACTED] seven alleged criminals, all FNU LNU, took them [REDACTED] and killed them [REDACTED], Davao del Norte.

29. **Incident 3:** On or about 4 December 2013, members of the DDS shot and killed three alleged thieves, [REDACTED], [REDACTED] in or around Agdao Public Market, Davao City.
30. **Incident 4:** On or about [REDACTED] 2014, members of the DDS shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Davao City.
31. **Incident 5:** On or about [REDACTED] 2014, members of the DDS shot and killed an alleged thief [REDACTED], Davao City.
32. **Incident 6:** On or about [REDACTED] 2014, members of the DDS shot and killed alleged drug pusher FNU LNU in or around [REDACTED], Davao City.
33. **Incident 7:** On or about [REDACTED] 2014, members of the DDS shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Davao City.
34. **Incident 8:** On or about [REDACTED] 2016, members of the DDS shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Davao City.
35. **Incident 9:** On or about [REDACTED] 2016, members of the DDS shot and killed alleged drug pusher [REDACTED], Davao City.

***b. Count 2: Murders of High-Value Targets during the Presidential period***

36. The murders in **Count 2**, as set out in Incidents 10 to 14 below, were perpetrated by members of the National Network in locations across the Philippines during DUTERTE's Presidency between around July 2016 and July 2017. The victims were individuals labelled as "high-value", including for their alleged involvement in drug manufacturing or drug syndicates. Some of the victims were listed in the 'PRRD List' (referring to the initials of "President Rodrigo Roa Duterte"), with targets categorised by tier according to their assigned 'value' (Levels 1 to 5). Police who killed a target on the list could access a covert reward system (which existed outside of the regular formal rewards system) and receive a payment ranging from 50,000 to one million Philippine pesos, depending on the level of the target. On various occasions, DUTERTE publicly named individuals or held up a chart (including the PRRD List) identifying individuals who he claimed were involved in the illegal drug trade or other forms of criminality. The physical perpetrators of the murders in **Count 2** meant to cause the victims' deaths or were aware that their deaths would occur in the ordinary course of events.

37. **Incident 10:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Manila. The victim was listed as a ‘High-Value Target’ and “known drug personality” on the PRRD List.

38. **Incident 11:** On or about [REDACTED] 2016, [REDACTED] under the instruction of police and with the assistance of [REDACTED] stabbed and killed alleged drug manufacturers [REDACTED], [REDACTED] and [REDACTED]. The [REDACTED] victims were all listed as ‘High-Value Targets’ and “drug lords” on the PRRD List.

39. **Incident 12:** On or about [REDACTED] 2016, a team comprised of personnel from the PNP and PDEA shot and killed alleged drug manufacturers [REDACTED] and [REDACTED] in or around [REDACTED].

40. **Incident 13:** On or about 5 November 2016, PNP personnel shot and killed Rolando Rosal ESPINOSA Snr and Raul YAP while the victims were in custody at the Leyte Sub-Provincial Jail, Baybay City, Leyte. ESPINOSA and YAP were both listed as ‘High-Value Targets’ and ‘drug lords’ on the PRRD List.

41. **Incident 14:** On or about the early morning of 30 July 2017, PNP personnel killed Ozamiz City Mayor Reynaldo PAROJINOG Snr (alias ‘Aldong’) and multiple other individuals [REDACTED] in the Mayor’s family residence [REDACTED]. The murders were committed after DUTERTE had claimed during a 7 August 2016 televised press conference that Mayor PAROJINOG was involved in the illegal drug trade. Mayor PAROJINOG was listed as a ‘High-Value Target’ and drug “protector” on the PRRD List.

*c. Count 3: Murders and attempted murders in barangay clearance operations during the Presidential period*

42. The murders and attempted murders in **Count 3**, as set out in Incidents 15 to 49 below, were perpetrated by members of the National Network in locations across the Philippines during DUTERTE’s Presidency between around July 2016 and September 2018. The victims were alleged to be ‘lower-level’ criminals. The physical perpetrators of the crimes in **Count 3** meant to cause the victims’ deaths or were aware that their deaths would occur in the ordinary course of events.

43. **Incident 15:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged

drug pusher [REDACTED] in or around [REDACTED], Manila. The victim was listed as a drug pusher on [REDACTED] “Illegal Drug Watchlist”.

44. **Incident 16:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug pushers/users [REDACTED] and [REDACTED] in or around [REDACTED], Manila.

45. **Incident 17:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged criminal FNU LNU [REDACTED] in or around [REDACTED], Bulacan.

46. **Incident 18:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug pushers [REDACTED] and [REDACTED], in or around [REDACTED], Bulacan.

47. **Incident 19:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug pusher [REDACTED] around [REDACTED], Manila. The victim was listed as a drug user in the PRRD List and as a drug pusher on [REDACTED] “Illegal Drug Watchlist”.

48. **Incident 20:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Manila.

49. **Incident 21:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug personalities [REDACTED], [REDACTED] and [REDACTED] in or around [REDACTED], Quezon City. PNP personnel shot [REDACTED].

50. **Incident 22:** On or about the night of [REDACTED] 2016, PNP personnel shot [REDACTED] alleged drug pusher [REDACTED] on or around [REDACTED], Manila, [REDACTED].

51. **Incident 23:** On or about the night of 4 to 5 October 2016, PNP personnel shot and killed alleged drug user Benjamin VISDA y CAPULE (alias ‘Jon’ or ‘Jun’) on or around Raxabago Street, Tondo, Manila. The victim was listed as a drug user on PS-1’s “July Illegal Drug Watchlist”.

52. **Incident 24:** On or about [REDACTED] 2016, PNP personnel shot and killed alleged drug pusher [REDACTED] on or around [REDACTED], Manila.

53. **Incident 25:** Between about [REDACTED] 2017, PNP personnel shot and killed alleged drug user [REDACTED] on or around [REDACTED], Bulacan.

54. **Incident 26:** On or about [REDACTED] 2017, PNP personnel shot and killed alleged drug user [REDACTED], on or around [REDACTED], Manila.
55. **Incident 27:** On or about [REDACTED] 2017, PNP personnel shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Bulacan. The victim was listed as a drug pusher on [REDACTED] “Illegal Drug Watch List”.
56. **Incident 28:** On or about 15 August 2017, PNP personnel shot and killed alleged drug user [REDACTED] in or around [REDACTED], Bulacan.
57. **Incident 29:** On or about 15 August 2017, PNP personnel shot and killed alleged drug user [REDACTED] and [REDACTED] in or around [REDACTED], Bulacan.
58. **Incident 30:** On or about 16 August 2017, PNP personnel shot and killed alleged drug user Kian Loyd DELOS SANTOS y DOGILLO in or around *Barangay* 160, Caloocan City. The victim was a male child, aged 17 years old.
59. **Incident 31:** On or about [REDACTED] 2017, PNP personnel shot and killed alleged thief [REDACTED] on or around [REDACTED], Manila.
60. **Incident 32:** On or about [REDACTED] 2017, PNP personnel shot and killed alleged drug user [REDACTED] in or around [REDACTED], Bulacan.
61. **Incident 33:** On or about [REDACTED] 2017, PNP personnel shot and killed alleged drug pushers [REDACTED] and [REDACTED] in or around [REDACTED], Manila. The victims were listed as drug pushers on [REDACTED].
62. **Incident 34:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug user [REDACTED] in or around [REDACTED], Bulacan.
63. **Incident 35:** On or about [REDACTED] 2018, PNP personnel shot and killed [REDACTED] on or around [REDACTED], Manila.
64. **Incident 36:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug pushers FNU LNU [REDACTED] and FNU LNU [REDACTED] on or around [REDACTED], Manila.
65. **Incident 37:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug user FNU LNU in or around [REDACTED], Bulacan.

66. **Incident 38:** On or about [REDACTED] 2018, PNP personnel strangled and killed alleged thief and drug user [REDACTED] in or around [REDACTED], Bulacan. The victim was a male child, aged approximately [REDACTED].
67. **Incident 39:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug user [REDACTED] in [REDACTED], Bulacan.
68. **Incident 40:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug thief [REDACTED] in or around [REDACTED], Bulacan.
69. **Incident 41:** On or about [REDACTED] 2018, PNP personnel and non-police assets strangled and killed alleged drug user [REDACTED] in or around [REDACTED], Bulacan.
70. **Incident 42:** In the days following [REDACTED] 2018, PNP personnel shot and killed alleged drug user FNU LNU [REDACTED], in [REDACTED], Bulacan.
71. **Incident 43:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug user [REDACTED] on or around [REDACTED], Manila.
72. **Incident 44:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged [REDACTED] thief [REDACTED] in or around [REDACTED], Bulacan.
73. **Incident 45:** Between around [REDACTED] 2018, PNP personnel strangled and killed an alleged thief FNU LNU [REDACTED] in or around [REDACTED], Bulacan. The victim was a male child, aged approximately [REDACTED].
74. **Incident 46:** Between about [REDACTED] 2018, PNP personnel and a non-police hitman shot and killed alleged drug user [REDACTED] and shot, suffocated and killed alleged drug user [REDACTED], in or around [REDACTED], Bulacan.
75. **Incident 47:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug pusher [REDACTED] in or around [REDACTED], Bulacan.
76. **Incident 48:** On or about the night of [REDACTED] 2018, PNP personnel shot and killed alleged drug user [REDACTED] at [REDACTED], Manila.
77. **Incident 49:** On or about [REDACTED] 2018, PNP personnel shot and killed alleged drug pusher [REDACTED] in or around [REDACTED].

**For these reasons, Rodrigo Roa DUTERTE is criminally responsible for:**

**Count 1:** Murder as a crime against humanity in Davao City during the Mayoral period of the 19 victims of Incidents 1 to 9, between 2013 and around June 2016, pursuant to articles 7(1)(a) and 25(3)(a) (indirect co-perpetration) and/or 25(3)(b) (ordering and/or inducing) and/or 25(3)(c) (aiding and abetting);

**Count 2:** Murder as a crime against humanity of ‘High-Value Targets’ in locations across the Philippines during the Presidential period of the 14 victims of Incidents 10 to 14, between around July 2016 and July 2017, pursuant to articles 7(1)(a) and 25(3)(a) (indirect co-perpetration) and/or 25(3)(b) (ordering and/or inducing) and/or 25(3)(c) (aiding and abetting);

**Count 3:** Murder and attempted murder as crimes against humanity in *barangay* clearance operations in locations across the Philippines during the Presidential period of the 45 victims (43 murders and two attempted murders) of Incidents 15 to 49, between around July 2016 and September 2018, pursuant to articles 7(1)(a) and/or 25(3)(f) and 25(3)(a) (indirect co-perpetration) and/or 25(3)(b) (ordering and/or inducing) and/or 25(3)(c) (aiding and abetting).

A handwritten signature in black ink, appearing to read 'Mandiaye Niang' with a stylized flourish below it.

---

**Mame Mandiaye Niang, Deputy Prosecutor**

Dated this 13<sup>th</sup> day of February 2026

At The Hague, the Netherlands