

REPUBLIC OF THE PHILIPPINES
SUPREME COURT
Manila

ATTY. ARJEL P. DE GUZMAN,
CHRISTOPHER STAR DE LA TORRE,
EDDIE FRANCIS CESAR PLAZA,
ELIEZER RABADON, and CARLO
OPLE,

Petitioners,

versus

DEPARTMENT OF INFORMATION AND
COMMUNICATIONS TECHNOLOGY
SECRETARY HENRY RHOEL R.
AGUDA, CYBERCRIME
INVESTIGATION AND COORDINATING
CENTER EXECUTIVE DIRECTOR
RENATO A. PARAISO, and NATIONAL
TELECOMMUNICATIONS
COMMISSION COMMISSIONER ELLA
BLANCA B. LOPEZ,

Respondents.

G.R. NO._____

For: Petition for *Certiorari*
and Prohibition under
Rule 65 of the Rules of
Court

PETITION

Petitioners, through the undersigned counsel, respectfully submits the present Petition for *Certiorari* and Prohibition under the following averments:

Prefatory Statement

Experience should teach us to be most on our guard to protect liberty when the Government's purposes are beneficent. Men born to freedom are naturally alert to repel invasion of their liberty by evil-minded rulers. The greatest dangers to liberty lurk in insidious encroachment by men of zeal, well-meaning but without understanding.

— **Justice Louis Brandeis**, dissenting in *Olmstead v. United States*, 277 U.S. 438 (1928)

The State's noble crusade against cybercrime cannot be used as a blunt instrument to demolish the digital public square. As Justice Brandeis famously warned, '*The greatest dangers to liberty lurk in insidious encroachment by men of zeal, well-meaning but without understanding.*' By threatening a wholesale, nationwide blockage of global communication platforms premised on a twenty-four (24) hour "ultimatum" of an administrative whim, the Respondents have crossed the line from protection into unconstitutional prior restraint, severing millions of Filipinos from their modern avenues of expression and livelihood without a shred of judicial due process.

Nature of the Petition

1. The present petition is instituted pursuant to the expanded *certiorari* jurisdiction of the Honorable Supreme Court under §1, Article VIII of the 1987 Constitution and Rule 65 of the Rules of Court, praying for the writs of *certiorari* and prohibition, to declare void and permanently enjoin the Respondents from implementing a unilateral, wholesale, and nationwide blocking through geofencing or any equivalent access-blocking method of websites and social networking services (SNS) platforms, including the global SNS platforms Reddit and **Discord**. The Petitioners aver that the unilateral, wholesale, nationwide blocking is *ultra vires* and violates the constitutional guarantees of free speech, free expression, due process, as well as the equal protection of the law under the 1987 Constitution.

2. Given the nature and extreme urgency of the legal dispute, involving as it does the substantial Philippine user base of such SNS and other similar platforms, direct recourse to the Honorable Court is made as there is no other plain, speedy, and adequate remedy in the ordinary course of law. The Honorable Court has allowed direct recourse under specified cases. In *Diocese of Bacolod v. Commission on Elections*¹, this Honorable Court outlined such exceptions:

2.1. Genuine and serious questions of constitutionality that must be addressed at the most immediate time. As will be shown by the nature of this case and resulting unilateral deprivation of the Petitioners and other similarly situated users' digital liberties, this case falls squarely under this exception.

¹

G.R. No. 205728, 21 January 2015.

2.2. **Transcendental importance.** The exponential alacrity by which technology is evolving parallels the dependency of human activities relying on such technologies. Among such activities, free speech has remarkably transcended from the realm of the orthodox into the technological sphere. One need not confine his thoughts on a piece of paper to convey them. Technologies like the internet, social networking platforms, and online forum enables the average Filipino to let communicate and express himself, whether situated locally or a thousand miles across the globe.

2.3. **Cases of first impression such that, and also, the constitutional issues raised are better decided by the Honorable Court.** The present case involves the recognition and protection of digital liberties as a fundamental right, one of first impression but equally of paramount importance.

Parties

3. Petitioner **Atty. Arjel P. de Guzman** is Filipino, of legal age, a lawyer, taxpayer and an account owner and user of **Discord**.

4. Petitioners **Christopher Star De La Torre, Eddie Francis Cesar Plaza, Eliezer Rabadon, and Carlo Ople** are all Filipinos, of legal age, a taxpayers and account owners and users of **Discord**.

4.1. Petitioners are instituting the present petition as taxpayers, account owners and users of **Discord**, and as legitimate parties with standing to interpose a facial challenge to Respondents' assailed actions. They may be served with the notices, orders, and other processes of this Honorable Court through the undersigned counsel's address hereinbelow indicated and, electronically, through the email address attorneys@deguzmanmayuga.com.

5. Respondent **Henry Rhoel R. Aguda** is the Secretary of the Department of Information and Communications Technology (DICT) who holds office at the DICT, with address at Studio 7, 807 Epifanio de los Santos Avenue, Diliman, Quezon City, where he may be served with *summons*, orders, notices, and other processes of this Honorable Court.

5.1. Respondent Aguda likewise sits as the Chairman of the Cybercrime Investigation and Coordinating Center’s Executive Committee.

6. Respondent **Renato A. Paraiso** is the Executive Director of the Cybercrime Investigation and Coordinating Center (CICC) who holds office at the CICC, with address at 807 Epifanio de los Santos Avenue, Diliman, Quezon City, where he may be served with *summons*, orders, notices, and other processes of this Honorable Court.

6.1. Respondent Paraiso likewise serves as an undersecretary of the DICT.

7. Respondent **Ella Blanca B. Lopez** is the Commissioner of the National Telecommunications Commission (NTC) who holds office at the NTC, with address at NTC Building, Sen. Miriam P. Defensor-Santiago Ave., East Triangle, Diliman, Quezon City, where she may be served with *summons*, orders, notices, and other processes of this Honorable Court.

Statement of Relevant Facts

8. **Reddit**² is a global, community-driven website, social news aggregation, forum, discussion, and social media platform where users, commonly referred to as “redditors,” create and participate in specialized, community-moderated forums called “subreddits.”

9. **Discord**³ is a social networking service provider which provides a real-time voice, video, and text communication platform that operates through private and semi-public servers, originally designed for gaming communities but which has rapidly evolved into an essential communication infrastructure for global organizations. **Discord** runs on Windows, macOS, Android, iOS, iPadOS, Linux, and in web browsers.

10. It provides a cloud-based communications platform comprising distinct virtual communities known as “servers.” These servers are subdivided into dedicated text, voice, and video communication spaces called “channels,” where users participate in

² <https://www.reddit.com/>, last accessed 24 September 2026.

³ <https://Discord.com/>, last accessed 24 September 2026.

real-time discussions, transmit multimedia files, and conduct live streams.

11. **Discord's** global reach and feature-rich platform make it an excellent choice for communities looking to connect, communicate, and collaborate. Crucially, the platform functions as a persistent archive for user speech, meaning that all text communications, direct messages, and shared media are stored indefinitely on **Discord's** servers unless manually deleted by a user or administrator.

12. In the Philippines, **Reddit** and **Discord** (hereinafter referred collectively as “platforms”) are not mere recreational websites. These platforms have evolved to become intrinsic components of the modern digital public square and essential tools for economic survival. Recent digital insights from late 2025 estimate that **Reddit alone has over 15.1 million users in the Philippines**. Similarly, the Philippines consistently ranks among **Discord's** top markets globally, with the platform deeply embedded in the daily digital lives of millions of Filipinos.⁴

13. As avenues of speech and democratic discourse, **Reddit**, particularly through its heavily trafficked national and regional subreddits (such as r/Philippines), functions as a vital avenue for anonymous, protected, and robust democratic discourse. It is where whistleblowers, journalists, civil society members, students, and ordinary citizens discuss socio-political matters, share news, and exact accountability free from the chilling effects often present in traditional, centralized media. It is the modern-day “plaza” for free expression.

14. On the other hand, **Discord** has evolved as an avenue for communication, discourse, work and livelihood for Filipinos. It has transitioned far beyond its gaming roots. Today, it serves as the primary virtual office and communications backbone for the Philippine digital and gig economy. Hundreds of thousands of Filipino freelancers, Virtual Assistants (VAs), Business Process Outsourcing (BPO) professionals, software developers, and digital creators rely exclusively on **Discord** to communicate with foreign clients, conduct daily business operations, and secure their livelihood.

⁴ <https://datareportal.com/reports/digital-2026-philippines>, last accessed 24 September 2026.

15. As of August 2026, the Philippines accounts for approximately 3.9% of **Discord's** estimated 200 million active monthly global userbase. Such figure suggests **roughly 6 to 7.8 million monthly active users of Discord are based in the Philippines**. Within the country itself, **Discord** is a major internet staple, ranking as the 22nd most visited website overall in the Philippines.⁵

16. Both **Reddit** and **Discord** serve as critical hubs for academic interaction, peer-to-peer learning, and civic organization, providing safe, decentralized spaces for student groups, hobbyists, and grassroots communities to organize safely and organically.

17. On 21 September 2026, Respondent Cybercrime Investigation and Coordinating Center (CICC), acting through its Executive Director Renato Paraiso, issued formal letters directed to the administrators of **Reddit** and **Discord**.

18. Purportedly acting on generalized concerns regarding online child safety and extremist violence in the wake of recent school shootings, the CICC issued an arbitrary, draconian, and physically impossible ultimatum: **Reddit and Discord were given a mere twenty-four (24) hours from receipt of the directive to designate a resident agent or establish a local representative in the Philippines**.

19. Most crucially, Respondent Paraiso has been quoted in several media publications explicitly threatening that the failure or refusal of these global platforms to comply within the prescribed 24-hour window would prompt the agency to unilaterally restrict their operations and mandate the wholesale, nationwide blocking of user access to both platforms in the Philippines.⁶

20. On 22 September 2026, Respondents Paraiso and Aguda wrote a letter, referred to as the CICC Directive No. NTC-CICC-2026-09-001⁷ to Respondent Lopez citing *“the continuing absence of a Philippine legal representative capable of receiving, acting upon, and being held accountable for lawful process from Philippine authorities”*

⁵ <https://www.similarweb.com/website/Discord.com/#geography>, last accessed 24 September 2026.

⁶ <https://mb.com.ph/2026/09/22/24-hours-to-comply-cicc-demands-reddit-Discord-to-set-up-local-offices>, last accessed 24 September 2026;
<https://tribune.net.ph/2026/09/22/after-facebook-govt-puts-reddit-Discord-on-notice>, last accessed 24 September 2026.

⁷ Copy of the purported letter attached and made an integral part of this *Petition* as **Annex A-1**.

as ground to request the NTC to **implement the temporary, precautionary suspension - by geofencing or equivalent access-blocking measure - of Discord in the Philippines for a period of fifteen (15) calendar days.**

21. Acting on such requests, Respondent Lopez issued NTC *Memorandum*⁸ dated 23 September 2026, addressed to all concerned internet service providers (ISPs), directing them to effect a temporary, precautionary suspension by geofencing or equivalent access-blocking measure of **Discord** messaging platform in the Philippines for a period of fifteen (15) calendar days. Respondent Lopez further directed the submission of said ISPs' compliance with the directive not later than five (5) days upon receipt, with copies furnished to the CICC and the DICT:



REPUBLIC OF THE PHILIPPINES
NATIONAL TELECOMMUNICATIONS COMMISSION
NTC Building, Sen. Miriam P. Defensor-Santiago Ave.,
East Triangle, Diliman, Quezon City
Email: ntc@ntc.gov.ph; Website: <http://www.ntc.gov.ph>



MEMORANDUM

TO: ALL CONCERNED INTERNET SERVICE PROVIDERS

SUBJECT: Cybercrime Investigation and Coordinating Center (CICC) DIRECTIVE (NTC-CICC-2026-09-001)

DATE: 23 September 2026

With reference to the enclosed letter dated 22 September 2026 from Cybercrime Investigation and Coordinating Center (CICC), signed by Department of Information and Communications Technology (DICT) Secretary, Hon. Henry R. Aguda and CICC Executive Director Atty. Renato A. Paraiso, you are hereby directed to effect the **temporary, precautionary suspension by geofencing or equivalent access-blocking measure of Discord messaging platform in the Philippines for a period of fifteen (15) calendar days**, subject to earlier lifting on the conditions set out in the enclosed letter.

Submit a report to this Commission of your compliance **with the directive not later than five (5) days upon receipt thereof**, with copy to the CICC and DICT.

For strict and immediate compliance.



ELLA BLANCA B. LOPEZ
Commissioner

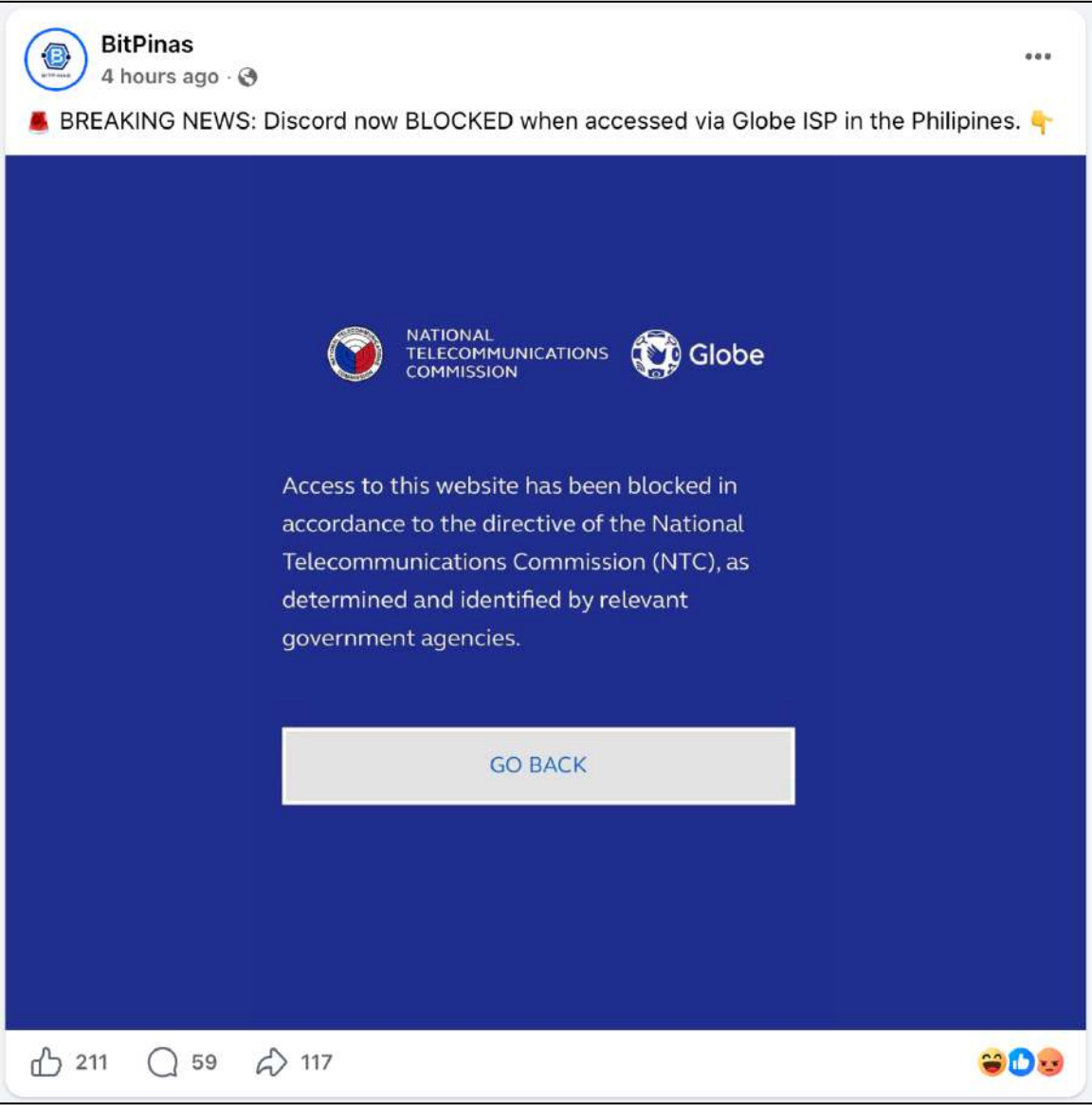
copy furnished:

HON. HENRY RHOEL R. AGUDA
Secretary
Department of Information and Communications Technology (DICT)
Studio 7, 807 Epifanio de los Santos Avenue
Diliman, Quezon City
osec@dict.gov.ph

ATTY. RENATO A. PARAISO
Executive Director
Cybercrime Investigation and Coordinating Center (CICC)
807 Epifanio de los Santos Avenue
Diliman, Quezon City
exedir1@cicc.gov.ph

22. Resultantly, in the evening of 23 September 2026, several internet users have started to post online about the apparent blocking of **Discord** in the Philippines, with most reporting that the platform was already inaccessible.

23. Particularly, BitPinas, a local media covering crypto, Web3, fintech, and the digital economy posted in its Facebook page⁹ that Globe has already blocked **Discord** pursuant to the NTC’s directive:



24. Petitioners who are all **Discord** account owners and user likewise noticed and confirmed that the said platform was no longer accessible locally because of the ban, as they were unable to access the site and further log on to their accounts.

25. Media reports revealed that per tests and user reports, **Discord** was blocked on Globe, GOMO, and PLDT and is

⁹ <https://www.facebook.com/share/p/1CCGem3PKe/>, last accessed 24 September 2026.

inaccessible. **Discord** itself reported no platform-wide outage at the time, indicating that the disruption was localized to Philippine networks.¹⁰

26. The following day, on 24 September 2026, The DICT and CICC through Respondents Aguda and Paraiso have lifted the temporary ban on **Discord** and restored Philippine access to the SNS provider. The decision allegedly followed a meeting between Philippine officials and senior **Discord** executives, including the platform's Asia-Pacific public policy directors.¹¹

Procedural Arguments

I

The present case falls under the Honorable Court's expanded *certiorari* jurisdiction, judicial power, and duty to determine the Respondents' governmental acts violation of the constitutional guarantee to free speech, due process, and equal protection of the laws.

II

The requisites of the Honorable Court's exercise of judicial review under §1, Article VIII of the 1987 Constitution and Rule 65 are present in this case.

III

The Petitioner's direct recourse to this Honorable Court is valid and justified under the following attendant circumstances:

- A. The petition raises purely questions of law.
- B. The petition involves genuine and serious questions of constitutionality;

¹⁰ <https://politiko.com.ph/2026/09/23/Discord-disconnected-ph-telcos-block-platform-amid-cicc-crackdown/daily-feed/>, last accessed 24 September 2026.

¹¹ <https://newsinfo.inquirer.net/2311234/govt-lifts-temporary-ban-on-Discord-after-online-safety-commitment>, last accesses 26 September 2026.

- C. The petition involves issue of transcendental importance and public interest;
- D. The case is of first impression, involving as it does, digital liberties of the Petitioners and of those similarly situated;

IV

The present case presents an exception to the doctrine of mootness.

Substantive Arguments

The Respondents' acts are unconstitutional and tainted with grave abuse of discretion amounting to lack of jurisdiction considering that:

I

Respondents have no authority to impose a unilateral, wholesale, and nationwide blocking of websites and social networking services.

II

The unilateral, wholesale, and nationwide blocking of websites and social networking services platforms constitutes prior restraint which violates the constitutional guarantees of free speech.

III

Respondents implemented the unilateral, wholesale, and nationwide blocking of websites and social networking services platforms in violation of due process of law.

IV

The Respondents' unilateral, wholesale, and nationwide blocking of websites and social networking services platforms violates the equal protection of the of law.

V

The unilateral, wholesale, and nationwide blocking of websites and social networking services platforms is impermissibly vague, overbroad, and fails strict scrutiny.

Discussion

A. Procedural Arguments

I. The instant petition is within the Honorable Court's expanded certiorari jurisdiction, judicial power, and duty to determine whether the Respondents' governmental acts violated the constitutional guarantee to free speech, due process, and equal protection of the laws.

27. The 1987 Constitution provides the groundwork for the Honorable Court's *certiorari* jurisdiction – the expanded judicial power of review under §1, Article VIII:

Section 1. *The judicial power shall be vested in one Supreme Court and in such lower courts as may be established by law.*

*Judicial power includes the duty of the courts of justice to settle actual controversies involving rights which are legally demandable and enforceable, **and to determine whether or not there has been a grave abuse of discretion amounting to lack or excess of***

jurisdiction on the part of any branch or instrumentality of the Government.¹²

28. Judicial review, as stressed by this Honorable Court in *Francisco v. House of Representatives*¹³, is the power of the courts to test the validity of executive and legislative acts for their conformity with the Constitution. Through such power, the judiciary enforces and upholds the Constitution.

29. Among the most fundamental and cherished rights in a democratic society is the freedom of speech and expression, including freedom of the press. It is essential to individual self-fulfillment, the search for truth, public participation in social and political decision-making, and the maintenance of a balance between stability and change.¹⁴

30. In the Philippines, this right is guaranteed by §4, Article III, of the 1987 Constitution, which provides that no law shall abridge freedom of speech, expression, or the press.

31. The right, as it is today, extends to the internet and social media. This Honorable Court has recognized cyberspace as an **“incomparable, pervasive medium of communication”** and noted that social media expands the reach of expression and public discussion:¹⁵

The exercise of the freedoms of expression, speech, and the press gained further traction with the advent of the digital age. Social media has not only encouraged the exercise of these rights, but has extended the reach of its content to audiences across the globe—proving that “cyberspace is an incomparable, pervasive medium of communication.” On the flip side, caution has been raised that the original message on social media may be taken out of context and misconstrued by the unintended audience:

These platforms in social media allow users to establish their own social network. It enables instantaneous online interaction, with each social networking platform thriving on its ability to engage more and more users. In order to acquire more users, the owners and developers of these social media sites constantly provide their users with more features, and with more opportunities to interact. The number of

¹² Emphasis is supplied.

¹³ G.R. No. 102621, 10 November 2003.

¹⁴ *Francisco Chavez v. Raul M. Gonzales, et al.*, G.R. No. 168338, 15 February 2008.

¹⁵ *Atty. Rico V. Domingo, et al., v. Lorraine Marie T. Badoy-Partosa*, G. R. No. 263384, 15 August 2023.

networks grows as each participant is invited to bring in more of their friends and acquaintances to use the platforms. Social media platforms, thus, continue to expand in terms of its influence and its ability to serve as a medium for human interaction. These also encourage self-expression through words, pictures, video, and a combination of these genres. xxx¹⁶

32. As a fundamental principle of every democratic government, the public's freedom of expression should be respected and protected to the fullest extent possible.¹⁷ Thus, the Petitioners are seeking succor to this Honorable Court to resolve the constitutionality of the Respondents' collective actions infringing their right to freedom of speech and of expression, an actionable controversy which this Honorable Court can take cognizance as the guardian of constitutional rights.¹⁸

33. As guardians, protectors, and final arbiters of the rule of law, people rely on the Court with substantial certainty and encourages the resolution of disputes in courtrooms rather than on the streets.¹⁹ This democratic order is dependent on the maintenance of the public's confidence in judicial independence both in its decisions and in the institution as a whole.²⁰

34. The Petitioners and others similarly situated owners and users of **Discord**, have been denied and are continually threatened to being denied access to their respective accounts. More importantly, they have been and are threatened to be denied access to free and an unabridged medium of expression and discourse facilitated in **Discord** and other similar websites or SNS platforms, which is a blatant affront to the guarantees of the Constitution. Government regulation must not be exercised in a manner that constricts avenues for public discussion.²¹

35. Writs of *certiorari* and prohibition are not confined exclusively to the correction of errors of jurisdiction of judicial or quasi-judicial tribunals. It is a remedy to determine whether any branch, agency, or instrumentality of the Government, such as the

¹⁶ *Id.*

¹⁷ *Atty. Herminio Harry L. Roque, Jr. v. Armed Forces of the Philippines (AFP) Chief of Staff, Gen. Gregorio Pio Catapang, et al.*, G.R. No. 214986, 15 February 2017.

¹⁸ *Andulfagar Pungutan v. Benjamin Abubakar, et al.*, G.R. No. L-33541, 20 January 1972.

¹⁹ *In re Allegations Contained in the Columns of Mr. Amado P. Macasaet Published in Malaya* dated September 18, 19, 20, and 21, 2007, 583 Phil. 391, 435 (2008).

²⁰ *Re: COA Opinion on Computation of Appraised Value of Properties Purchased by the Retired Chief Assoc. Justices of the SC*, 692 Phil. 147, 156-157 (2012)

²¹ *ABS CBN Corporation and Jorge Cariño v. Datu Andal Ampatuan, Jr.*, G. R. No. 227004, 25 April 2023.

Respondents, has committed grave abuse of discretion amounting to lack or excess of jurisdiction and to render such judgment as necessary to correct government transgressions.²²

36. Writs of *certiorari* and prohibition may be issued to correct, undo, or restrain any act of grave abuse of discretion amounting to lack or excess of jurisdiction committed by any branch or instrumentality of the Government, regardless of whether the respondent body or official exercises judicial, quasi-judicial, or ministerial function.²³

II. The requisites of the Honorable Court's exercise of judicial review under §1, Article VIII of the 1987 Constitution and Rule 65 are present in this case.

37. Settled is the rule that no question involving the constitutionality or validity of a law or a governmental act may be heard and decided by the Supreme Court unless the legal requisites of judicial review are obtaining, namely:

- (a) there must be an actual case or controversy calling for the exercise of judicial power;
- (b) the person challenging the act must have the standing to question the validity of the subject act or issuance;
- (c) the question of constitutionality must be raised at the earliest opportunity; and
- (d) the issue of constitutionality must be the very *lis mota* of the case.²⁴

38. All the requisites of judicial review are present in this present case.

A. The petition involves an actual case or controversy.

39. The requisite of actual case or controversy is complied with when the matter before the court involves a conflict of legal rights,

²² *Samahan ng mga Progresibong Kabataan v. Quezon City*, G.R. No. 225442, 8 August 2017.

²³ *Maria Carolina P. Araullo, et al., v. Benigno Simeon Aquino III, et al.*, G.R. No. 209287, 1 July 2014.

²⁴ *Province of Camarines Sur v. Commission on Audit*, G.R. No. 227926, 10 March 2020.

an assertion of opposite legal claims susceptible of judicial resolution.²⁵

40. An actual case or controversy is one which involves a conflict of legal rights, an assertion of opposite legal claims susceptible of judicial resolution. A case is justiciable if the issues presented are definite and concrete, touching on the legal relations of parties having adverse legal interests. The conflict must be ripe for judicial determination, not conjectural or anticipatory; otherwise, this Court's decision will amount to an advisory opinion concerning legislative or executive action.²⁶

41. Here, Respondents arrogated upon themselves the authority which was not vested in law. Worse, and in doing so, Respondents violated and impaired the Petitioners' constitutionally guaranteed rights to freedom of speech and expression. Hence, this Honorable Court is called upon to pass upon such illegal acts and protect the Petitioners, as well as those others similarly situated, against the trampling of their rights under the constitution.

B. Petitioners have locus standi to institute the present action.

42. Petitioners have legal standing or *locus standi* being taxpayers and **Discord** account owners and users, all equally having a personal stake in the outcome of the controversy being direct victims of the governmental action in question – the directive prohibits them or denies them access to **Discord**, including the public discourse and exchange of ideas made accessible to the public through such platforms.

43. Petitioners have sustained and/or is immediately in danger of sustaining violation of their constitutionally protected rights to free speech and expression, a direct injury resulting from the Respondents' actions.

44. Even then, Respondents' actions merit a facial challenge. Respondents' issuances and governmental actions resulting therefrom, when measured from the rubrics of the Constitution, are

²⁵ *Atty. Howard M. Calleja, et al., v. Executive Secretary, et al.*, G.R. No. 252578, 07 December 2021.

²⁶ *Alliance of Non-Life Insurance Workers of the Philippines, et al., v. Hon. Leandro R. Mendoza, et al.*, G.R. No. 206159, 26 August 2020.

palpably invalid on its face for having been issued or implemented without any speck of authority.

45. Thus, in *Calleja*²⁷, despite the absence of actual facts, a facial review of the law was permitted because the petitioners sufficiently raised concerns regarding the freedom of speech, expression, and its cognate rights. This Court held:

As such, the petitions present a permissible facial challenge on the ATA in the context of the freedom of speech and its cognate rights — and it is only on these bases that the Court will rule upon the constitutionality of the law In fact, the Court is mindful that several of the petitioners have already come under the operation of the ATA as they have been designated as terrorists.

46. The ruling case law is that petitioners who assail a law as void on the basis of its vagueness and overbreadth are exempted from the strict rule on standing. A law that is vague and overly broad is considered as an immense evil and destructive of fundamental rights in a democratic regime, it ought to be struck down at the earliest opportunity by anyone in the body politic. It is a threat not just to one, but it is a threat to all, and anyone can represent all in excising it out from our statute book.²⁸ Such is the situation in this present case.

C. The question of constitutionality is being raised at the earliest opportunity.

47. The petition is filed at the earliest opportunity. Earliest opportunity means that the question of unconstitutionality of the act in question should have been immediately raised in the proceedings before a competent body.²⁹ As set forth in the case of *Ma. Angelina J. Matibag v. Alfredo L. Benipayo, et al.*,³⁰ the term “earliest opportunity” was declared to mean:

Respondents harp on petitioner’s belated act of questioning the constitutionality of the ad interim appointments of Benipayo, Borra and Tuason. Petitioner filed the instant petition only on August 3, 2001, when the first ad interim appointments were issued as early as March 22, 2001. However, it is not the date of filing of the petition that determines whether the constitutional issue was raised at the

²⁷ *Supra.* note 22.

²⁸ *Id.*

²⁹ *Foundation for Economic Freedom v. Energy Regulatory Commission*, G.R. No. 214042, 13 August 2024.

³⁰ G.R. No. 149036, 02 April 2002.

earliest opportunity. The earliest opportunity to raise a constitutional issue is to raise it in the pleadings before a competent court that can resolve the same, such that, “if it is not raised in the pleadings, it cannot be considered at the trial, and, if not considered at the trial, it cannot be considered on appeal.” Petitioner questioned the constitutionality of the ad interim appointments of Benipayo, Borra and Tuason when she filed her petition before this Court, which is the earliest opportunity for pleading the constitutional issue before a competent body. Furthermore, this Court may determine, in the exercise of sound discretion, the time when a constitutional issue may be passed upon. There is no doubt petitioner raised the constitutional issue on time.

48. Accordingly, the present petition is filed at the earliest opportunity considering that the same is an original action before the Honorable Court which has unquestionable jurisdiction to pass upon the questions of constitutionality raised in the present petition.

D. The issue of constitutionality is the very lis mota of the case.

49. The decision on the constitutional question raised is determinative of the case and therefore, constitutes the *lis mota* of the controversy. Petitioners raise the question the propriety of Respondent’s acts of imposing and threatening to impose wholesale blocking of websites or platforms. The disposition of this constitutional question determines whether the Petitioners are entitled to the reliefs of *certiorari*, prohibition, and injunction sought in the present petition.

50. All the foregoing considered, the Petitioners respectfully submit that all the requisites of judicial review have been sufficiently met in this case.

III. The direct recourse to this Honorable Court is justified under the circumstances.

51. While the doctrine of the hierarchy of courts generally bars litigants from bypassing lower courts, *Gios-Samar, Inc. v. Department of Transportation and Communications and Civil Aviation Authority of the Philippines*,³¹ reminds us that this is not merely a rule of policy but a constitutional safeguard. This Court explained that it is not a trier of

³¹ G.R No. 217158, 12 March 2019.

facts and is ill-equipped to assess evidence in the first instance. As such, cases raising factual issues are better resolved by lower courts or regulatory agencies.

52. However, in *Diocese of Bacolod v. Commission on Elections*³², this Honorable Court laid down exceptions to the doctrine of the hierarchy of courts, which allow the direct invocation of this Honorable Court's jurisdiction under certain circumstances, namely:

- (a) genuine issues of constitutionality that must be addressed immediately;
- (b) issues of transcendental importance where fundamental constitutional rights are imminently threatened;
- (c) matters of first impression where no controlling jurisprudence exists;
- (d) constitutional questions more appropriately resolved by the Court;
- (e) cases involving urgency due to exigent circumstances where delay would defeat the purpose of the petition;
- (f) review of an act of a constitutional organ; or
- (g) lack of any other plain, speedy, and adequate remedy in the ordinary course of law; and
- (h) questions dictated by public welfare, advancement of public policy or broader interests of justice, where the challenged order are patent nullities, or appeal is inappropriate.

53. Applying the foregoing to the instant case, the Petitioners seek the mantle of judicial protection directly from this Honorable Court to correct the clear and unequivocal constitutional breach of the Constitution under the justifying circumstances attendant herein.

A. The petition raises purely questions of law.

54. Jurisprudence sets out that direct resort to this Honorable Court has been held proper when only pure questions of law are involved.³³ This Honorable Court has recognized that a direct invocation of its original jurisdiction, as an exception to the doctrine

³² *Supra*. note 1.

³³ *Satur Ocampo, et al., v. President Macapagal-Arroyo, et al.*, G.R. No. 182734, June 27, 2023.

of hierarchy of courts, is warranted when what is raised is a pure question of law.³⁴

55. The present petition raises purely questions of law, as it does not involve disputed facts. The assailed acts imputed to the Respondents are all official actions, performed by the Respondents in their respective official capacities.

56. Respondents' public "ultimatum" to the platforms **Discord** and Reddit, the subsequent wholesale, nationwide blocking of **Discord**, and the lifting of such so-called ban, were all covered heavily by the Philippine media and publicly admitted by the Respondents themselves.

57. Respectfully, the Petitioners maintain that the factual antecedents and bases of the instant case are matter of mandatory judicial notice being official acts of the Respondents as officers of the Executive Department of the Philippines pursuant to §1, Rule 29 of the Rules of Court.

58. The official acts of Respondent Sec. Aguda of the DICT, Respondent Paraiso of the CICC and Respondent Lopez of the NTC, are subject to mandatory judicial notice under the doctrine of qualified political agency and as an extension of the Executive Department, the CICC and NTC being attached agencies of the DICT.

59. Moreover, judicial notice can be taken over facts evidenced by public records and facts of general notoriety, as in this present case.

B. The petition involves genuine and serious question of constitutionality.

60. The doctrine of hierarchy of courts recognizes multiple exceptions including when the case involves serious constitutional issues. As discussed, the *lis mota* of the instant case hinges on the constitutionality of Respondents' acts, assailed collectively, as *ultra vires* and violative of the constitutionally guaranteed freedom of speech and of expression.

³⁴ *Smartmatic TIM Corporation, et al., v. Commission on Elections, et al.*, G.R. No. 270564, April 16, 2024.

61. The Respondents directly admitted there are those who were affected and inconvenienced by the wholesale, nationwide blockage of **Discord**.³⁵ The admission thus implicates the constitutional guarantees of free speech, due process, and equal protection under the applicable laws and the constitutional limits to Respondents' governmental powers.

62. The genuine and serious character of the involved constitutional questions impels the Petitioners to raise them before this Honorable Court which has, in our constitutional system, the solemn and sacred obligation of adjudicating constitutional questions and to establish for the parties in an actual controversy the rights which that instrument secures and guarantees to them to uphold the supremacy of the Constitution.³⁶

C. The petition involves issues of transcendental importance and of public interest.

63. In cases of transcendental importance, the imminence and clarity of the threat to fundamental constitutional rights outweigh the necessity for prudence. The doctrine relating to constitutional issues of transcendental importance prevents courts from the paralysis of procedural niceties when clearly faced with the need for substantial protection.³⁷

64. The case at bar is one of transcendental importance. Here, there is a clear threat to the paramount right of freedom of speech and of expression which warrants invocation of relief from this Honorable Court. The principles sought before the Honorable Court will likely influence the discourse of freedom of speech in the future, especially in the realms of digital communications and cyberspace.

³⁵ In an official press conference on 24 September 2026, Respondent Paraiso was quoted saying:

"I would also like to take this opportunity to apologize to those who were affected and inconvenienced by the hours-long ban on Discord. Please don't worry, as we are already working to resolve everything."

See <https://newsinfo.inquirer.net/2311409/dict-online-platform-execs-meet-Discord-ban-lifted>, last accessed 25 September 2026.

³⁶ *Jose A. Angara v. The Electoral Commission, et al.*, G.R. No. 45081, 15 July 1936.

³⁷ *Initiatives for Dialogue and Empowerment through Alternative Legal Services, Inc. (IDEALS, INC.) v. Power Sector Assets and Liabilities Management Corporation (PSALM)*, G.R. No. 192088, 09 October 2012.

65. Recent studies reveal that a total of 137 million cellular mobile connections were active in the Philippines in late 2025, with this figure equivalent to 117 percent of the total population. However, note that some of these connections may only include services such as voice and SMS, and some may not include access to the internet. There were 98.0 million individuals using the internet in the Philippines at the end of 2025, when online penetration stood at 83.8 percent. The Philippines was home to 95.8 million social media user identities in October 2025, equating to 81.9 percent of the total population.³⁸ Such significant figures amplify the power of speech and expression. Along with it, the truism that digital space created another realm for speech and expression to thrive which should equally merit the protection of the law.

66. Digital communications and cyberspace provide technologies and platform which are exponentially evolving. Years ago, digital communication was not a staple means of communications. It was never recognized as an avenue for free speech and expression. The present innovations and the prevalence of platforms like **Reddit** and **Discord** have further shrunk the very microcosm of public discourse and communication, thereby blurring locational and territorial boundaries to new heights, enabling exchanges that was before unimaginable. To some, these platforms form part of their daily lives, their livelihood even.

67. The present petition also raises substantial constitutional issues of transcendental importance and of public interest that are better resolved by this Honorable Court. The questions concern the scope and enforcement of constitutional liberties in the digital sphere and require a uniform rule applicable to courts, government agencies, and persons similarly situated throughout the country.

68. Accordingly, it would be worth the while for this Honorable Court to pass upon such transcendental issues and took upon the liberty of taking the opportune time, which the present petition presents, to impart its invaluable wisdom.

D. The case is of first impression, involving as it does, digital liberties of the Petitioners and of those similarly situated.

³⁸ https://datareportal.com/report-embed-issues?utm_source=Global_Digital_Reports&utm_medium=Partner_Article&utm_campaign=Digital_2026, last accessed 26 September 2026.

69. The case at bar presents a genuine case of first impression concerning the constitutional limits of wholesale, nationwide blocking of websites and platforms, a "kill switch-like" measure in the digital sphere. The precise question whether a government act, even when authorized, that it disables, blocks, suspends, or materially impairs access to a digital service, platform, network, application, or communications facility may be implemented when its practical effect is to burden constitutional rights, including freedom of speech and of expression, access to information, and the ability to communicate and participate in digital life. Thus, it calls to question the propriety of such acts juxtaposed to the people's various digital liberties.

70. The present petition raises a materially novel question. It does not merely challenge the regulation of particular online content or the prosecution of a defined cybercrime. It challenges the legality and constitutionality of a measure that operates at the level of access itself —one that may disable an entire digital service, platform, network, or class of digital activity, thereby affecting lawful users and lawful expression together with any allegedly unlawful conduct.

71. The challenged measure of wholesale, nationwide blocking of websites and platforms operates in an environment where digital acts may be implemented immediately, replicated at scale, and completed before a conventional judicial proceeding can provide effective relief. The absence of a prompt and authoritative ruling may therefore permit the continued or repeated impairment of Petitioners' rights and may cause the same issue to evade meaningful review.

72. The constitutional inquiry must therefore determine whether the herein Respondents may employ a measure whose breadth and immediate operation resemble a digital "kill switch," and, if so, what constitutional safeguards must precede its implementation.

73. These questions cannot be answered by treating digital access as an ordinary regulatory privilege. In the modern digital environment, disabling a platform or communications facility may simultaneously impair expression, receipt and dissemination of information, privacy, association, livelihood, education, and access to public and private services.

III. The present case is an exception to the doctrine of mootness.

74. Even assuming, solely for purposes of argument, that the lifting of the wholesale, nationwide blocking of **Discord** rendered some aspect of the petition moot, jurisprudence has been instructive that this Honorable Supreme Court may still resolve the case where any of the following circumstances is present³⁹:

- (a) there is a grave violation of the Constitution;
- (b) the situation is of exceptional character and paramount public interest is involved;
- (c) the constitutional issue raised requires the formulation of controlling principles to guide the Bench, the Bar, and the public; or
- (d) the challenged act is capable of repetition yet evading review.

75. The acts and issuances assailed in this petition constitute, or are attended by, a grave violation of the Constitution because they impair constitutional and fundamental rights of the Petitioners. The alleged violation is not merely technical or incidental. It directly affects free speech and expression.

76. Respondents' lifting of the wholesale, nationwide blockage of **Discord** cannot validate an act that was allegedly unconstitutional from the beginning. This Honorable Court's wisdom and ruling remain necessary to determine whether the Respondents acted within the limits imposed by the Constitution and whether their assailed acts should be nullified, restrained, or otherwise declared legally ineffective.

77. Furthermore, Respondents' assailed actions are capable of repetition yet evading review.

78. In *Diocese of Bacolod*⁴⁰, the Supreme Court stated:

xxx We evaluate restrictions on freedom of expression from their effects. We protect both speech and medium because the quality of

³⁹ *Francis Leo Antonio Marcos v. Commission on Elections*, G.R. No. 277280, 30 September 2025.

⁴⁰ *Supra*. note 1.

this freedom in practice will define the quality of deliberation in our democratic society.

COMELEC’s notice and letter affect preferred speech. Respondents’ acts are capable of repetition. Under the conditions in which it was issued and in view of the novelty of this case, it could result in a “chilling effect” that would affect other citizens who want their voices heard on issues during the elections. Other citizens who wish to express their views regarding the election and other related issues may choose not to, for fear of reprisal or sanction by the COMELEC.

Direct resort to this court is allowed to avoid such proscribed conditions. Rule 65 is also the procedural platform for raising grave abuse of discretion.

79. In this case, the challenged action is, by its nature, too short in duration to be fully litigated before its cessation or expiration. Respondents may impose a blocking measure immediately and may likewise lift it before the affected platform, users, or other interested parties can obtain effective judicial relief. By the time the Court is able to resolve the petition, the blocking may once again have been withdrawn, thereby insulating the measure from ordinary judicial review.

80. It bears emphasis that Respondents’ acts are not new, Roblox Corp., an online gaming platform received the same threats of blockage albeit subsequently suspended, from the CICC⁴¹. Such threats remain subsisting with Respondent Paraiso was quoted speaking to the media:⁴²

“Ultimately, the power to limit them or to exclude them from the PH sphere is an option that is available to us. There can be warnings first, then there could be measurable KPIs that they are failing their commitments,”

81. More importantly, although access to **Discord** was subsequently restored, such supervening event did not constitute a voluntary and binding abandonment of the challenged authority, policy, or practice. Respondents have neither disavowed their asserted power to order or cause the unilateral, wholesale, and nationwide blocking of websites, SNS providers and digital platforms

⁴¹ <https://dict.gov.ph/news-and-updates/26558>, last accessed 27 Septemebr 2026.

⁴² <https://newsinfo.inquirer.net/2211879/roblox-ban-still-possible-if-child-protection-commitments-fail-cicc>, last accessed 27 September 2026.

nor represented that they will refrain from imposing the same or substantially similar measure in the future.

82. The restoration of access therefore did not eliminate the controversy. It merely terminated the immediate implementation of the challenged measure while leaving unresolved the legality of the authority, procedure, standards, and safeguards under which Respondents may again block **Discord** or similarly situated digital platforms.

83. There is a deeply reasonable expectation that **Discord**, Petitioners, and others similarly situated will again be subjected to the same action. Respondents' assailed acts of implementing a unilateral, wholesale, nationwide blocking of websites and SNS providers—only to quickly lift the blockage—constitutes an evasive 'wash-rinse-repeat' cycle designed precisely to escape judicial scrutiny and insulate grave constitutional violations from review.

B. Substantive Arguments

The Respondents' acts are unconstitutional and tainted with grave abuse of discretion amounting to lack of jurisdiction considering that:

I. Respondents have no authority to impose a unilateral, wholesale, and nationwide blocking of websites and social networking services.

84. The Respondents possess no legal mandate nor authority to impose the assailed unilateral, wholesale, and nationwide blocking of websites and social networking services.

85. The National Telecommunications Commission (NTC), headed by Respondent Lopez, an attached agency under the Department of Information and Communications Technology, is vested with the general mandate of regulating, supervising, and controlling all telecommunications, broadcast, and radio communication services in the Philippines.

86. In *Next Mobile Inc. v. National Telecommunications Commission*⁴³, this Honorable Court had the opportunity to trace the creation and evolution of the NTC's legal mandate, viz:

Commonwealth Act No. 146 or the Public Service Act of 1936 established under the Department of Justice Public Service Commission, which was vested with the "jurisdiction, supervision, and control over all public services." Public services included "wire or wireless communications system, wire or wireless broadcasting stations and other similar public services." The Integrated Organization Plan under Presidential Decree No. 1, series of 1972, created a Board of Communications, which subsumed the functions of the Public Service Commission. In 1979, under Executive Order No. 546, the Board of Communications and another agency, the Telecommunications Control Bureau, was integrated into a single entity known as the National Telecommunications Commission as part of the Ministry of Transportation and Communications. The Commission had the following functions:

a. Issue Certificate of Public Convenience for the operation of communications utilities and services, radio communications systems, wire or wireless telephone or telegraph systems, radio and television broadcasting system and other similar public utilities;

b. Establish, prescribe and regulate areas of operation of particular operators of public service communications; and determine and prescribe charges or rates pertinent to the operation of such public utility facilities and services except in cases where charges or rates are established by international bodies or associations of which the Philippines is a participating member or by bodies recognized by the Philippine Government as the proper arbiter of such charges or rates;

c. Grant permits for the use of radio frequencies for wireless telephone and telegraph systems and radio communication systems including amateur radio stations and radio and television broadcasting systems;

d. Sub-allocate series of frequencies of bands allocated by the International Telecommunications Union to the specific services;

e. Establish and prescribe rules, regulations, standards, specifications in all cases related to the issued Certificate of Public Convenience and administer and enforce the same;

f. Coordinate and cooperate with government agencies and other entities concerned with any aspect involving

⁴³

G.R. No. 188655, 13 November 2023.

communications with a view to continuously improve the communications service in the country;

g. Promulgate such rules and regulations, as public safety and interest may require, to encourage a larger and more effective use of communications, radio and television broadcasting facilities, and to maintain effective competition among private entities in these activities whenever the Commission finds it reasonably feasible;

h. Supervise and inspect the operation of radio stations and telecommunications facilities;

i. Undertake the examination and licensing of radio operators;

j. Undertake, whenever necessary, the registration of radio transmitters and transceivers; and

k. Perform such other functions as may be prescribed by law.

In 1987, under Executive Order No. 125166 and Executive Order No. 125-A, the National Telecommunications Commission became an attached agency of the Department of Transportation and Communications.

Congress later recognizing that "develop[ing] and maintain[ing] a viable, efficient, reliable and universal telecommunication infrastructure using the best available and affordable technologies [is] a vital tool to nation building and development," passed Republic Act No. 7925, or the Public Telecommunications Policy Act of the Philippines. Under the law, the National Telecommunications Commission was made its principal administrator, with the following responsibilities:

(a) Adopt an administrative process which would facilitate the entry of qualified service providers and adopt a pricing policy which would generate sufficient returns to encourage them to provide basic telecommunications services in unserved and underserved areas;

(b) Ensure quality, safety, reliability, security, compatibility and inter-operability of telecommunications facilities and services in conformity with standards and specifications set by international radio and telecommunications organizations to which the Philippines is a signatory;

(c) Mandate a fair and reasonable interconnection of facilities of authorized public network operators and other providers of telecommunications services through appropriate modalities of interconnection and at a reasonable and fair level of charges, which make provision for the cross subsidy to

unprofitable local exchange service areas so as to promote telephone density and provide the most extensive access to basic telecommunications services available at affordable rates to the public;

(d) Foster fair and efficient market conduct through, but not limited to, the protection of telecommunications entities from unfair trade practices of other carriers;

(e) Promote consumers welfare by facilitating access to telecommunications services whose infrastructure and network must be geared towards the needs of individual and business users;

(f) Protect consumers against misuse of a telecommunications entity's monopoly or quasi-monopolistic powers by, but not limited to, the investigation of complaints and exacting compliance with service standards from such entity; and

(g) In the exercise of its regulatory powers, continue to impose such fees and charges as may be necessary to cover reasonable costs and expenses for the regulation and supervision of the operations of telecommunications entities.

By 2015, however, Congress enacted Republic Act No. 10844, which created the Department of Information and Communications Technology. The National Telecommunications Commission became an attached agency of this Department but it "shall continue to operate and function in accordance with the charters, laws or orders creating them, insofar as they are not inconsistent with [the law]."

87. The NTC's mandate is generally regulatory. It may supervise telecommunications facilities and services, issue operating authorities, prescribe technical and service standards, regulate authorized entities, and enforce applicable telecommunications laws.⁴⁴

88. On the other hand, the Department of Information and Communications Technology, of which Respondent Aguda is the current Secretary, was created by Republic Act No. 10844, known as the *Department of Information and Communications Technology Act of 2015*. The law established the DICT as a separate national department and transferred to it the Information and Communications

⁴⁴ *National Telecommunications Commission vs. Brancomm Cable and Television Network Co.*, G.R. No. 204487, 05 December 2019.

Technology (ICT)-related functions previously dispersed among different government offices.

89. §6 of RA 10844 outlines the powers and functions of the DICT, namely:

SEC. 6. Powers and Functions. – The Department shall exercise the following powers and functions:

I. Policy and Planning

(a) Formulate, recommend and implement national policies, plans, programs and guidelines that will promote the development and use of ICT with due consideration to the advantages of convergence and emerging technologies;

(b) Formulate policies and initiatives, in coordination with the Department of Education (DepED), the Commission on Higher Education (CHED), and the Technical Education and Skills Development Authority (TESDA), to develop and promote ICT in education consistent with the national goals and objectives, and responsive to the human resource needs of the ICT and ICT-ES sectors;

(c) Provide an integrated framework in order to optimize all government ICT resources and networks for the identification and prioritization of all E-Government systems and applications as provided for the E-Government Masterplan and the Philippine Development Plan (PDP);

II. Improved Public Access

(d) Prescribe rules and regulations for the establishment, operation and maintenance of ICT infrastructures in unserved and underserved areas, in consultation with the local government units (LGUs), civil society organizations (CSOs), private sector, and the academe;

(e) Establish a free internet service that can be accessed in government offices and public areas using the most cost-effective telecommunications technology, through partnership with private service providers as may be necessary;

III. Resource-Sharing and Capacity-Building

(f) Harmonize and coordinate all national ICT plans and initiatives to ensure knowledge, information and resource-sharing, database-building and agency networking linkages among government agencies, consistent with E-Government objectives in particular, and national objectives in general;

(g) Ensure the development and protection of integrated government ICT infrastructures and designs, taking into

consideration the inventory of existing manpower, plans, programs, software, hardware, and installed systems;

(h) Assist and provide technical expertise to government agencies in the development of guidelines in the enforcement and administration of laws, standards, rules, and regulations governing ICT;

(i) Assess, review and support ICT research and development programs of the government in coordination with the Department of Science and Technology (DOST) and other institutions concerned;

(j) Prescribe the personnel qualifications and other qualification standards essential to the effective development and operation of government ICT infrastructures and systems;

(k) Develop programs that would enhance the career advancement opportunities of ICT workers in government;

(l) Assist in the dissemination of vital information essential to disaster risk reduction through the use of ICT:

(m) Represent and negotiate for Philippine interest on matters pertaining to ICT in international bodies, in coordination with the Department of Foreign Affairs (DFA) and other institutions concerned;

IV. Consumer Protection and Industry Development

(n) Ensure and protect the rights and welfare of consumers and business users to privacy, security and confidentiality in matters relating to ICT, in coordination with agencies concerned, the private sector and relevant international bodies;

(o) Support the promotion of trade and investment opportunities in the ICT and ICT-ES sectors, in coordination with the Department of Trade and Industry (DTI) and other relevant government agencies and the private sector;

(p) Establish guidelines for public-private partnerships in the implementation of ICT projects for government agencies; and

(q) Promote strategic partnerships and alliances between and among local and international ICT, research and development, educational and training institutions, to speed up industry growth and enhance competitiveness of Philippine workers, firms, and small and medium enterprises in the global markets for ICT and ICT-ES.

90. Being the primary policy, planning, coordinating, implementing, and administrative entity of the Executive Branch for the national ICT development agenda, the DICT principally sets and coordinates national ICT policy, while the NTC continues to exercise its specialized regulatory functions under its own charter.

91. The Cybercrime Investigation and Coordinating Center, where Respondent Paraiso is the current Executive Director, was created by Republic Act No. 10175, known as the *Cybercrime Prevention Act of 2012*. It was established as an inter-agency body under the administrative supervision of the Office of the President, principally for policy coordination among concerned agencies and for the formulation and enforcement of the national cybersecurity plan.

92. Particularly, §26 of RA 10175 enumerates the powers and functions of the CICC, to wit:

Section 26. Powers and Functions. — The CICC shall have the following powers and functions:

- (a) To formulate a national cybersecurity plan and extend immediate assistance for the suppression of real-time commission of cybercrime offenses through a computer emergency response team (CERT);*
- (b) To coordinate the preparation of appropriate and effective measures to prevent and suppress cybercrime activities as provided for in this Act;*
- (c) To monitor cybercrime cases being bandied by participating law enforcement and prosecution agencies;*
- (d) To facilitate international cooperation on intelligence, investigations, training and capacity building related to cybercrime prevention, suppression and prosecution;*
- (e) To coordinate the support and participation of the business sector, local government units and nongovernment organizations in cybercrime prevention programs and other related projects;*
- (f) To recommend the enactment of appropriate laws, issuances, measures and policies;*
- (g) To call upon any government agency to render assistance in the accomplishment of the CICC's mandated tasks and functions; and*
- (h) To perform all other matters related to cybercrime prevention and suppression, including capacity building and such other functions and duties as may be necessary for the proper implementation of this Act.*

93. A scrutiny of the respective mandates of the NTC, the DICT, and the CICC reveals, glaringly, that said agencies do not have the authority or power to implement a unilateral, wholesale, and nationwide blocking of websites and social networking services platforms.

94. Even more glaring, the CICC through Respondents Aguda and Paraiso, unilaterally announced the lifting of the ban, after “negotiations” with **Discord** and absent any compliance with the purported initial conditions set out in the NTC *Memorandum* effecting the blockage. Simply, Respondents Aguda and Paraiso treated the NTC as mere conduit of governmental powers and arrogated unto themselves the mandate, which, in the first place, is not vested upon their respective government agencies. What the DICT and CICC are prohibited from doing directly, they cannot do indirectly.

95. A public official exercises power, not rights.⁴⁵ The government itself is merely an agency through which the will of the state is expressed and enforced. Its officers therefore are likewise agents entrusted with the responsibility of discharging its functions. As such, there is no presumption that they are empowered to act. There must be a delegation of such authority, either express or implied. In the absence of a valid grant, they are devoid of power. What they do suffers from a fatal infirmity.⁴⁶ There is no such delegation empowering the Respondents as heads of the NTC, DICT, and CICC to implement a unilateral, wholesale, and nationwide blocking of websites and social networking services platforms.

96. In *Radio Communications of the Philippines, Inc. v. National Telecommunications Commission*,⁴⁷ the Supreme Court held that NTC, as an administrative body, has only those powers expressly granted or necessarily implied by its enabling statutes. Thus, the Court stated:

No substantial change has been brought about by Executive Order No. 546 invoked by the Solicitor General’s Office to bolster NTC’s jurisdiction. The Executive Order is not an explicit grant of power to impose administrative fines on public service utilities, including telegraphic agencies, which have failed to render adequate service to customers. Neither has it expanded the coverage of the supervisory and regulatory power of the agency. There appears to be no alternative but to reiterate the settled doctrine in administrative law that:

Too basic in administrative law to need citation of jurisprudence is the rule that jurisdiction and powers of administrative agencies, like respondent Commission, are limited to those expressly granted or necessarily implied from those granted in the legislation creating such body; and any order without or beyond such

⁴⁵ *Antonio J. Villegas v. Abelardo Subido, et al.*, G.R. No. L-26534, November 28, 1969

⁴⁶ *Radio Communications of the Philippines, Inc. v. Francisco Santiago & Enrique Medina*, G.R. No. L29236, 21 August 1974.

⁴⁷ G.R. No. 93237, 06 November 1992.

jurisdiction is void and ineffective. . . (Globe Wireless case, supra).

97. The rule applies to restrictions imposed by administrative agencies. In *Santiago C. Divinagracia v. Consolidated Broadcasting System, Inc.*,⁴⁸ the Supreme Court held that an agency restriction must pass not only constitutional scrutiny but also the test of authority and legitimacy—that is, it must trace its origin to a specific legislative grant or a valid delegation of rule-making power. An agency’s authority and faculties remain confined within the parameters set by Congress, viz:

The restrictions enacted by Congress on broadcast media franchisees have to pass the mettle of constitutionality. On the other hand, the restrictions imposed by an administrative agency such as the NTC on broadcast media franchisees will have to pass not only the test of constitutionality, but also the test of authority and legitimacy, i.e., whether such restrictions have been imposed in the exercise of duly delegated legislative powers from Congress. If the restriction or sanction imposed by the administrative agency cannot trace its origin from legislative delegation, whether it is by virtue of a specific grant or from valid delegation of rule-making power to the administrative agency, then the action of such administrative agency cannot be sustained. The life and authority of an administrative agency emanates solely from an Act of Congress, and its faculties confined within the parameters set by the legislative branch of government.

98. The foregoing becomes especially more significant in the light of this Honorable Court’s ruling in *Jose Jesus M. Disini, Jr., et al. v. The Secretary of Justice, et al.*,⁴⁹ which prohibits the unilateral restricting or blocking of access to computer data absent any judicial warrant found in §19 of RA 10175:

Not only does Section 19 preclude any judicial intervention, but it also disregards jurisprudential guidelines established to determine the validity of restrictions on speech. Restraints on free speech are generally evaluated on one of or a combination of three tests: the dangerous tendency doctrine, the balancing of interest test, and the clear and present danger rule. Section 19, however, merely requires that the data to be blocked be found prima facie in violation of any provision of the cybercrime law. Taking Section 6 into consideration, this can actually be made to apply in relation to any penal provision. It does not take into consideration any of the three tests mentioned above.

⁴⁸ G.R. No. 162272, 07 April 2009.

⁴⁹ G.R. No. 203335, 18 February 2014.

The Court is therefore compelled to strike down Section 19 for being violative of the constitutional guarantees to freedom of expression and against unreasonable searches and seizures.

II. The unilateral, wholesale, and nationwide blocking of websites and social networking services platforms constitutes prior restraint which violates the constitutional guarantees of free speech.

99. The NTC *Memorandum* dated 23 September 2026, the Respondents Aguda and Paraiso' CICC Directive No. NTC-CICC-2026-09-001 of 22 September 2026, and the Respondents' collective act to implement a unilateral, wholesale, and nationwide blocking of websites and social networking services platforms constitutes prior restraint which violates the constitutional guarantee of free speech and expression.

100. Respondents' acts directing the said ISPs to effect the temporary, precautionary suspension by geofencing or equivalent access-blocking measure of **Discord** messaging platform in the Philippines for a period of fifteen (15) calendar days disabling or restricting, on a wholesale basis, nationwide access to **Discord**.

101. It must be noted that the directive is not limited to a specific uniform resource locator (URL), computer file, account, or judicially identified item of unlawful content. Instead, it disables access to the entire platform, thereby preventing **Discord** users in the Philippines from accessing both allegedly unlawful and plainly lawful material.

102. Respondents' acts operate before any final judicial determination that **Discord**, its platform, website, or the content housed in its servers are unlawful. It restrains communication, publication, reception, and access to speech in advance of adjudication hence, a form of prior restraint that prevents the transmission and receipt of speech and expression before such may be judicially evaluated under the constitutional standards governing restrictions thereof.

103. Further, Respondents' acts constitute content-based restraint on speech and free expression given that it targets the

specific subject matter – that is, those that are confined within **Discord**, its platform, website, and servers.

104. An official government act need not take the form of a formal order or circular to constitute prior restraint. An act, including an official statement or directive made in the exercise of governmental functions, is subject to constitutional scrutiny when it has the effect of restricting freedom of speech or of the press.⁵⁰

105. Deeply ensconced in our fundamental law is the hostility against all prior restraints on speech, and any act that restrains speech is presumed invalid. In this case, the Respondents never proffered any substantial justification to overcome such presumption other than Respondents Aguda and Paraiso’s mere invocation of a “precautionary principle” on the “analogous doctrine of clear and present danger” absent any proof to substantiate such precautionary principle sufficient to curtail free speech and expression.

106. A governmental action that restricts freedom of speech or of the press based on content is given the strictest scrutiny in light of its inherent and invasive impact. Only when the challenged act has overcome the clear and present danger rule will it pass constitutional muster, with the government having the burden of overcoming the presumed unconstitutionality.⁵¹

107. Prior restraint on speech based on its content cannot be justified by hypothetical fears, but only by showing **a substantive and imminent evil that has taken the life of a reality already on ground**. As formulated, the question in every case is whether the words used are used in such circumstances and are of such a nature as to create a clear and present danger that they will bring about the substantive evils that Congress has a right to prevent. It is a question of proximity and degree.

108. Here, the Respondents not only failed to satisfy the requirements necessary to overcome the presumption against content-based prior restraint, they likewise, in the first place, failed to identify the particular incidents relating to **Discord**, its platform, website, or users constituting the danger that they seek to suppress or prevent. *Chavez* is quite instructive: **prior restraint on speech and expression cannot be justified by hypothetical fears**.

⁵⁰ *Francisco Chavez v. Raul M. Gonzales*, G.R. No. 168338, 15 February 2008.

⁵¹ *Id.*

109. Broad assertions that **Discord** has been used for OSAEC, scams, drug transactions, identity theft, harassment, and other crimes without demonstrating why access to **Discord** generally, rather than access to identified unlawful content or accounts, must be blocked fails to satisfy the clear and present danger doctrine.

110. The NTC *Memorandum* likewise fails to identify the specific danger that the blocking order supposedly addresses. It refers generally to “documented, recurrent, and unresolved patterns of criminal misuse,” but does not state the number of incidents, identify the affected servers or users, specify the continuing conduct, or explain why less restrictive measures, such as targeted takedown, account suspension, preservation requests, disclosure orders, or blocking of identified URLs, would be inadequate.

111. In fine, the Respondents failed to establish the gravity and imminence of the threatened harm but harped on conjectures or generalized apprehension which is prohibited.

III. Respondents implemented the unilateral, wholesale, and nationwide blocking of websites and social networking services platforms in violation of due process of law.

112. Respondents’ acts present the same constitutional vice identified in *Disini*. It allows executive officials to determine, without prior judicial intervention, that online expression or access to a platform should be suppressed and then commands intermediaries to enforce that determination nationwide.

113. Respondent Lopez’s NTC *Memorandum* orders the immediate, wholesale, nationwide blocking of **Discord** for fifteen (15) days without showing that **Discord** and its multitude of Filipino users were given notice of the specific allegations against them, an opportunity to submit evidence, or a meaningful opportunity to contest the necessity, scope, and duration of the blocking order.

114. The NTC *Memorandum* imposed a particular and immediate deprivation of **Discord’s** access and business operations without particularized notice, disclosure of the evidence, a meaningful opportunity to respond, substantial-evidence findings, objective standards, or prompt and effective review.

115. Equally, Respondents Aguda and Paraiso’s letter requests immediate implementation while making earlier lifting dependent on commitments “in a form satisfactory” to the DICT and CICC. The record does not show that **Discord** or its users were first furnished the evidence, invited to answer the allegations, or allowed to propose narrower remedial measures before the blocking order took effect. A unilateral demand for compliance after the restriction has already been imposed is not equivalent to a meaningful opportunity to contest the factual and legal basis of the deprivation.

116. It may be argued that the blocking is temporary and precautionary, and that due process may sometimes be satisfied by a post-deprivation hearing. However, *Board of Commissioners of the Bureau of Immigration v. Wenle*⁵² provides a stern reminder that summary temporary deprivation may be permissible in extraordinary circumstances if supported by a valid governmental interest and accompanied by subsequent procedural remedies that allow the affected party to challenge and recover its rights. Summary administrative action may be valid when the danger is immediate and urgent but invalidates summary action where there is no demonstrated pressure of time or need for immediate correction.⁵³

117. Here, the NTC *Memorandum’s* fifteen (15)-day duration does not by itself establish due process. Respondents fail to provide prompt review, a defined procedure for **Discord** and its users to contest the factual findings, objective lifting criteria, and a reasoned determination supported by evidence. Accordingly, Respondents’ acts constitute arbitrary deprivation imposed before **Discord** and its users had a fair opportunity to respond.

IV. The Respondents’ unilateral, wholesale, and nationwide blocking of websites and social networking services platforms violates the equal protection of the of law.

118. §1, Article III of the 1987 Constitution requires that persons or entities similarly situated be treated alike in the rights conferred and liabilities imposed⁵⁴. The Supreme Court has held that this protection

⁵² G.R. No. 242957, February 28, 2023.

⁵³ *Restituto Ynot v. Court of Appeals, et al.*, G.R. No. 74457, 20 March 1987 (*en banc*).

⁵⁴ Section 1. No person shall be deprived of life, liberty, or property without due process of law, nor shall any person be denied the equal protection of the laws.

applies to all official state action, including executive action and the manner in which laws are enforced.⁵⁵

119. Respondents' acts order all concerned internet service providers to implement a temporary, precautionary suspension of access to **Discord** in the Philippines for fifteen (15) calendar days through geofencing or an equivalent access-blocking measure. **Discord** was singled-out as the object of a platform-wide access restriction based on generalized allegations that **Discord** has been used for Online Sexual Abuse or Exploitation of Children (OSAEC), Child Sexual Abuse or Exploitation Materials (CSAEM), image-based sexual abuse, investment scams, illegal drug transactions, identity theft, account compromise, doxing, harassment, and other unlawful activity.

120. However, there was no objective classification that distinguishes **Discord** from other messaging, gaming, social-media, communications, or community platforms, and other similarly situated websites and SNS providers that may likewise be used to commit or facilitate the same unlawful acts.

121. Respondents did not state that **Discord** is the only platform hosting such activity, the only platform lacking adequate abuse-mitigation measures, the only platform that has failed to respond to Philippine authorities, or the only platform without a Philippine legal representative. Neither does it establish that other similarly situated platforms were subjected to the same investigation, compliance standards, or sanction.

122. The government may regulate platforms differently when real and substantial distinctions justify the difference in treatment. But the classification must rest on substantial distinctions, be germane to the purpose of the law, not be limited to existing conditions only, and apply equally to all members of the same class.⁵⁶

123. Furthermore, Respondents' acts impose a discriminatory burden on lawful users, such as petitioners herein, who have no connection with the alleged violations.

124. The challenged action does not distinguish between persons suspected of unlawful conduct and persons who merely use

⁵⁵ *Louis "Barok" C. Biraogo v. The Philippine Truth commission of 2010*, G.R. No. 192935, 07 December 2010 (*en banc*).

⁵⁶ *Id.*

Discord for lawful purposes. It applies equally to all Philippine **Discord** users, including persons who are not accused of, involved in, or connected with OSAEC, CSAEM, fraud, drug transactions, identity theft, harassment, or any other offense.

125. Equal protection prohibits the government from imposing a severe burden on an entire class of persons or entities based on unproven assumptions concerning the conduct of only some members, absent a substantial distinction and a close relation between the classification and the governmental objective.⁵⁷

126. Here, the unequal treatment is particularly arbitrary because the Respondents' directive is not limited to content or accounts identified as unlawful. It does not identify a factual basis showing that all **Discord** services, all **Discord** servers, or all Philippine **Discord** users present the danger invoked by Respondents.

IV. The unilateral, wholesale, and nationwide blocking of websites and social networking services platforms is impermissibly vague, overbroad and fails strict scrutiny.

127. Respondents' assailed acts are impermissibly vague because they fail to provide definite and objective standards identifying the facts, content, platforms, or legal violations that trigger blocking. It does not adequately specify the decision maker's evidentiary standard, the procedures for notice and hearing, or the means for review and termination. These omissions vest Respondents with uncontrolled discretion to determine what online expression may be accessed by the public.

128. Rightfully so, the day following the implementation of **Discord's** blocking, Respondents Aguda and Paraiso proceeded to confirm the lifting of the blockage in a press conference, premised on a mere commitment from **Discord**. Respondent Paraiso was quoted in said press conference:

⁵⁷ *Central Bank Employees Association, Inc. v. Bangko Sentral ng Pilipinas*, G.R. No. 148208, 15 December 2024.

*We secured a commitment from Discord to collaborate with us in achieving our goal of further strengthening the online safety measures we are implementing for our country.*⁵⁸

129. Respondents’ assailed acts are likewise overbroad as they suppress, substantially, more protected speech and expression than necessary, provides no sufficiently definite standards governing the selection, scope, duration, and termination of the blocking order, and is not narrowly tailored to achieve a compelling governmental interest through the least restrictive means.

130. The unilateral, wholesale, nationwide blocking implemented by the Respondents disables access to the entire **Discord** platform in turn impairing broad bodies of online expression, when the government’s asserted objectives could have been pursued through narrower measures directed at specifically identified URLs, websites, accounts, files, or content. It thereby restricts substantially more speech than is necessary to achieve any legitimate governmental objective.

131. In fact, least intrusive methods like targeted takedowns and account suspensions proved to be available measures to achieve Respondents’ alleged objectives.

132. **Discord** has been transparent on the takedown requests and actions it undertook regarding suspected and complained accounts, servers, or activities. In its *2026 Transparency Report*,⁵⁹ **Discord** reported to have received 2,127 international legal requests during this period, responding to 926 (44%). In general, **Discord** directs foreign governments to seek user data via mutual legal assistance processes and evaluates requests, such as emergency disclosure requests, to disclose from foreign governments on a case-by-case basis. During this period, 40 pieces of legal process submitted by U.S. authorities were identified as having been issued as a result of mutual legal assistance requests that originated in Argentina, Australia, Chile, Georgia, Germany, Greece, Hungary, Japan, Peru, Poland, Portugal, Slovakia, South Korea, Spain, and Sweden.⁶⁰

⁵⁸ See <https://newsinfo.inquirer.net/2311021/dict-govt-cybercrime-center-confirm-Discord-ban-has-been-lifted>, last accessed 26 September 2026.

⁵⁹ <https://cdn.Discordapp.com/assets/transparency-reports/Discord-Transparency-Report-2026-Updated.pdf>, last accessed 28 September 2026.

⁶⁰ *Id.* at page 17-19.

133. **Discord** likewise received 5,665 preservation requests globally in 2026, finding 4,467 (79%) specific enough to preserve relevant information. **Discord** preserves information for 90 days and extends this preservation for an additional 90 days upon request.⁶¹

134. The same is true in most SNS platforms. *Meta*, an online social networking services provider, on the other hand, has reported around 34,000 restrictions it conducted in the period of July to December 2025⁶². Incidentally, a substantial number of such restrictions came from requests made by government agencies like the Department of Migrant Workers, the Department of Trade and Industry, and the Philippine Statistics Office.

135. Under the overbreadth doctrine, a proper governmental purpose, constitutionally subject to state regulation, may not be achieved by means that unnecessarily sweep its subject broadly, thereby invading the area of protected freedoms.⁶³

136. A law that is vague and overly broad is considered as an immense evil and destructive of fundamental rights in a democratic regime, it ought to be struck down at the earliest opportunity by anyone in the body politic. It is a threat not just to one, but it is a threat to all, and anyone can represent all in excising it out from our statute book.

137. Respondents' acts likewise fail strict scrutiny. Being content-based restriction on free speech and expression, Respondents' acts did not satisfy the burden of proving the restriction is necessarily and narrowly tailored to the compelling interest they seek to protect. By suppressing lawful speech and expression together with allegedly unlawful material when less restrictive, targeted, and judicially supervised alternatives are available, the Respondents failed to discharge such burden under the strict scrutiny test.

138. Strict scrutiny applies when what is at stake are fundamental freedoms or what is involved are suspect classifications. It requires that there be a compelling state interest and that the means employed to effect it are narrowly-tailored, actually — not only conceptually — being the least restrictive means for effecting the invoked interest. It does not suffice that the Respondents

⁶¹ *Id.* at page 20-21.

⁶² <https://transparency.meta.com/reports/content-restrictions/country/PH/>, last accessed 26 September 2026.

⁶³ *Joseph Ejercito Estrada v. Sandiganbayan*, G.R. No. 148560, 19 November 2001.

contemplated on the means available to it. Rather, it must be shown that an active effort at demonstrating the inefficacy of all possible alternatives. The governmental interests to be protected must not only be reasonable. They must be compelling.

139. Applying strict scrutiny, the focus is on the presence of compelling, rather than substantial, governmental interest and on the absence of less restrictive means for achieving that interest, and the burden befalls upon the State to prove the same.⁶⁴

140. Accordingly, in implementing the unilateral, wholesale, and nationwide blocking of websites and SNS providers, Respondents are not required to not only explore all possible avenues but to even debunk the viability of alternatives so as to ensure that its chosen course of action is the sole effective means. To the extent practicable, this must be supported by sound data gathering mechanisms.

141. However, in this case, the Respondents, despite the position they hold, appears to be uninitiated on the nature of Discord and other similar SNS providers. **On 24 September 2026, the CICC publicly apologized to the inconvenienced users of Discord, admitting that it was not clear to CICC that Discord is not exclusively a game-messaging platform and was widely used for education, work, and business operations when they briefly blocked the platform.**⁶⁵

142. During the 24 September 2026 episode of *CICC Hotline 1326* show in *Radyo Pilipinas*, CICC Director Aya Macalma was quoted:⁶⁶

However, we understand that there are people using Discord as their platform for businesses, for schools, and communications with other gaming. Kasi, ah, doon sa nabasa kong letter Discord is ano lang eh, it was created for communications for gaming. So, yung mga, mga bagong sinasabi ng ibang naapektuhan ng Discord eh ginagamit pala nila sa business, ginagamit nila sa pag-aaral, hindi pa naka-klaro sa amin yan ng Discord. We do apologize sa mga affected.

⁶⁴ *Kabataan Party List, et. Al, v. Commission on Elections*, G.R. No. 221318, 16 December 2016.

⁶⁵ <https://philstartech.com/news/2026/09/24/19772/cicc-Discord-business-school-use-philippines/>, last accessed 27 September 2026.

⁶⁶ <https://web.facebook.com/share/v/1C2bwikcxF/>, last accessed 25 September 2026.

143. ***Res ipsa loquitur.***

144. Clearly, Respondents cannot be expected to explore all possible avenues in implementing the unilateral, wholesale, and nationwide blocking of websites and SNS providers, debunk the viability of less intrusive alternatives when they do not fully grasp the nature and extent of the platform they are blocking.

PRAYER FOR RELIEF

Wherefore, premises considered, the Petitioners pray that this Honorable Court:

1. **ANNUL** and **SET ASIDE** NTC *Memorandum* dated 23 September 2026 and CICC Directive No. NTC-CICC-2026-09-001 dated 22 September 2026 directing ISPs to implement a unilateral, wholesale, and nationwide blocking through geofencing or any equivalent access-blocking method of **Discord** for being *ultra vires* and patently unconstitutional;
2. **ISSUE** a *Writ of Prohibition*, permanently restraining Respondents, and all persons acting under their authority from further implementing a unilateral, wholesale, and nationwide blocking through geofencing or any equivalent access-blocking method of websites and social networking services platforms; and
3. **DECLARE** that the Respondents, gravely abused their discretion amounting to lack or excess of jurisdiction when they issued NTC *Memorandum* dated 23 September 2026 and CICC Directive No. NTC-CICC-2026-09-001 dated 22 September 2026 thereby implementing a unilateral, wholesale, and nationwide blocking through geofencing or any equivalent access-blocking method of **Discord**.

Other just and equitable reliefs are likewise prayed for.

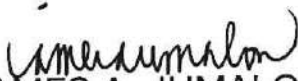
Makati City, for the City of Manila, 30 September 2026.

DE GUZMAN MAYUGA DE VERA JUMALON⁶⁷

Counsel for the Petitioners
16F Cityland Herrera Tower
98 VA Rufino Street, Salcedo Village
Makati City 1227 Metro Manila
attorneys@deguzmanmayuga.com



ARJEL P. DE GUZMAN
Roll of Attorneys No. 62516
PTR No. 10769135; 01/06/2026; Makati City
IBP No. 576076; 12/29/2025; Makati City
MCLE VIII No. 0043352; Pasig City; 07/09/2026
e-mail: arjel@deguzmanmayuga.com



JAMES A. JUMALON
Roll of Attorneys No. 63615
PTR No. 10769137; 01/06/2026; Makati City
IBP No. 581375; 12/31/2025; Pasig City
MCLE VIII No. 0026360; Pasig City; 04/07/2025
Mobile: +63 917 659 3155
e-mail: james@deguzmanmayuga.com

Copy served to:

Hon. Sec. Henry Rhoel R. Aguda
Department of Information and Communications Technology (DICT)
Studio 7, 807 Epifanio de los Santos Avenue,
Diliman, Quezon City,

Renato A. Paraiso
Executive Director
Cybercrime Investigation and Coordinating Center (CICC)
807 Epifanio de los Santos Avenue,
Diliman, Quezon City,

⁶⁷ In compliance with Supreme Court Resolution dated 17 February 2015 in Bar Matter No. 850 and OCA Circular No. 56-2015 dated 17 March 2015, hereunder are the MCLE Compliance Numbers of the undersigned Firm’s named partners, to wit:

Name	MCLE Number	Validity
Adrian B. Mayuga	MCLE VIII No. 0014389	14 April 2028
Ma. Christine Fel P. De Vera	MCLE No. VIII-0031410	14 April 2028

Ella Blanca B. Lopez

Commissioner

National Telecommunications Commission (NTC)

NTC Building, Sen. Miriam P. Defensor-Santiago Ave.,
East Triangle, Diliman, Quezon City

Office of the Solicitor General

OSG Building, 134 Amorsolo St.,
Legaspi Village, Makati City

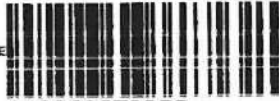
Explanation

Due to distance, time, and manpower constraints, a copy of the foregoing petition was served upon the above-cited parties through an accredited private courier pursuant to §5, Rule 13, as amended by A.M. No. 19-10-20-SC and OCA Circular No. 07-2026.


ARJEL P. DE GUZMAN

LBC EXPRESS, INC.

UNIT 2 UG/F CITYLAND HERRERA TOWER, RUF1
NO CORNER VALERO STREET, SALCEDO VILLAGE, BE
Tel. No : (63) 2 - 79498118
VAT REG. TIN : 000-782-140-01100



139943973368

THIS SERVES AS AN INVOICE

TIN : 25102922443854321
Serial No : 1-BR01100-GH0L7XH3
Invoice No : SLZ05100000030237
Customer's Copy

SHIPPER: DE GUZMAN MAYUGA, DE VERA JUMALON

Address: 16F CITYLAND HERRERA TOWER, RUFINO
ST BEL-AIR CITY OF MAKATI NATIONAL CAPITAL
REGION NCR
Contact No.: 53104926 /9157595420
TIN: Email:

CONSIGNEE: THE OFFICE OF THE, SOLICITOR GENERAL

And or/ care of:
Address: 134 AMORSOLO ST LEGASPI VILLAGE SAN
LORENZO CITY OF MAKATI NATIONAL CAPITAL REGION NCR
Contact No.: 9000000000

Courier N-Pouch XL

Quantity : 1
Origin : NMA-SLZ05-CITYLAND HERRERA
Tran. Date : 10/01/2026 03:33:13 PM
Delivery Date : 10/02/2026
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-Off : 04:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 117.06
Supplies Fee : (0.00)
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
Demand Surcharge : 0.04
Total Sales/Unit Cost: 125.90
12% VAT : 15.10
Amount Due : 141.00
Discount : 0.00
Mode : CASH

Track your padala at:

www.lbcexpress.com

Talk to our Care Representative

Tel. : (632) 8858-5999

1-800-10-8585-999

*Only for PH outside NCR

Said to Contain : DOCS

LBC Express values your privacy. For more info, visit www.lbcexpress.com/privacy

SHIPPER WARRANTS THAT THE SHIPMENT HAS NO CASH INSIDE. CLAIMS OF CARGO ARE
LIMITED UP TO ACTUAL DECLARED VALUE ONLY.
I hereby agree to be bound with the terms and conditions written at the
back set forth by LBC EXPRESS

Let us know of your experience:

bit.ly/CSATPH

JOHN WINSTON ENRIQUEZ
Signature of Associate

DE GUZMAN MAYUGA, DE VERA JUMALON
Signature of Shipper

Invoice Series No : SLZ0510000000001 to SLZ0509999999999 BIR Final PTU#:FP102025-126-0559771-00000
BIR Accreditation No: 1260007821402025072404 Date Issued: 10/23/2025

LBC EXPRESS, INC.

UNIT 2 UG/F CITYLAND HERRERA TOWER, RUF1
NO CORNER VALERO STREET, SALCEDO VILLAGE, BE
Tel. No : (63) 2 - 79498118
VAT REG. TIN : 000-782-140-01100



139943973378

THIS SERVES AS AN INVOICE

TIN : 25102922443854321
Serial No : 1-BR01100-GH0L7XH3
Invoice No : SLZ05100000030238
Customer's Copy

SHIPPER: DE GUZMAN MAYUGA, DE VERA JUMALON

Address: 16F CITYLAND HERRERA TOWER, RUFINO
ST BEL-AIR CITY OF MAKATI NATIONAL CAPITAL
REGION NCR
Contact No.: 53104926 /9157595420
TIN: Email:

CONSIGNEE: LOPEZ, ELLA BLANCA

And or/ care of:
Address: NTC BLDG SEN MERIAM P DEFENSON SANTIAGO
AVE DILIMAN EAST TRIANGLE CENTRAL QUEZON CITY
NATIONAL CAPITAL REGION NCR
Contact No.: 9000000000

Courier N-Pouch XL

Quantity : 1
Origin : NMA-SLZ05-CITYLAND HERRERA
Tran. Date : 10/01/2026 03:35:20 PM
Delivery Date : 10/02/2026
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-Off : 04:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 117.06
Supplies Fee : (0.00)
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
Demand Surcharge : 0.04
Total Sales/Unit Cost: 125.90
12% VAT : 15.10
Amount Due : 141.00
Discount : 0.00
Mode : CASH

Track your padala at:

www.lbcexpress.com

Talk to our Care Representative

Tel. : (632) 8858-5999

1-800-10-8585-999

*Only for PH outside NCR

Said to Contain : DOCS

LBC Express values your privacy. For more info, visit www.lbcexpress.com/privacy

SHIPPER WARRANTS THAT THE SHIPMENT HAS NO CASH INSIDE. CLAIMS OF CARGO ARE
LIMITED UP TO ACTUAL DECLARED VALUE ONLY.
I hereby agree to be bound with the terms and conditions written at the
back set forth by LBC EXPRESS

Let us know of your experience:

bit.ly/CSATPH

JOHN WINSTON ENRIQUEZ
Signature of Associate

DE GUZMAN MAYUGA, DE VERA JUMALON
Signature of Shipper

Invoice Series No : SLZ0510000000001 to SLZ0509999999999 BIR Final PTU#:FP102025-126-0559771-00000
BIR Accreditation No: 1260007821402025072404 Date Issued: 10/23/2025

LBC EXPRESS, INC.

UNIT 2 UG/F CITYLAND HERRERA TOWER, RUFINO
NO CORNER VALERO STREET, SALCEDO VILLAGE, BE
Tel. No. : (63) 2 - 79490110
VAT REG. TIN : 000-782-140-01100

**139943973682****THIS SERVES AS AN INVOICE**

TIN : 25102922443054321
Serial No : 1-BR01100-6M0L7XH3
Invoice No : SLZ0510000030235
Customer's Copy

SHIPPER: DE GUZMAN MAYUGA, DE VERA JUMALON

Address: 16F CITYLAND HERRERA TOWER, RUFINO
ST BEL-AIR CITY OF MAKATI NATIONAL CAPITAL
REGION NCR
Contact No.: 53104926 / 9157595420
TIN: Email:

CONSIGNEE: AGUDA, HENRY RHOEL

And or / care of: /

Address: DICT STUDIO 7 807 EDSA AVE DILIMAN
CENTRAL QUEZON CITY NATIONAL CAPITAL REGION NCR
Contact No.: 9000000000

Courier N-Pouch XL

Quantity : 1
Origin : MMA-SLZ05-CITYLAND HERRERA
Tran. Date : 10/01/2026 03:30:50 PM
Delivery Date : 10/02/2026
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-Off : 04:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 117.86
Supplies Fee : (0.00)
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
Demand Surcharge : 0.04
Total Sales/Unit Cost: 125.90
12% VAT : 15.10
Amount Due : 141.00
Discount : 0.00
Mode : CASH

Track your padala at:

www.lbcexpress.com

Talk to our Care Representative

Tel. : (632) 8858-5999

1-800-10-8585-999

*Only for PH outside NCR

Said to Contain : DOCS

LBC Express values your privacy. For more info, visit www.lbcexpress.com/privacy

SHIPPER WARRANTS THAT THE SHIPMENT HAS NO CASH INSIDE. CLAIMS OF CARGO ARE
LIMITED UP TO ACTUAL DECLARED VALUE ONLY.
I hereby agree to be bound with the terms and conditions written at the
back set forth by LBC EXPRESS

Let us know of your experience:

bit.ly/CSATPH

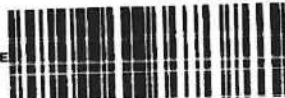
JOHN WINSTON ENRIQUEZ
Signature of Associate

DE GUZMAN MAYUGA, DE VERA JUMALON
Signature of Shipper

Invoice Series No : SLZ0510000000001 to SLZ0509999999999 BIR Final PTUM:FP102025-126-0559771-00000
BIR Accreditation No: 1260007021402025072404 Date Issued: 10/23/2025

LBC EXPRESS, INC.

UNIT 2 UG/F CITYLAND HERRERA TOWER, RUFINO
NO CORNER VALERO STREET, SALCEDO VILLAGE, BE
Tel. No. : (63) 2 - 79490110
VAT REG. TIN : 000-782-140-01100

**139943973672****THIS SERVES AS AN INVOICE**

TIN : 25102922443054321
Serial No : 1-BR01100-6M0L7XH3
Invoice No : SLZ0510000030236
Customer's Copy

SHIPPER: DE GUZMAN MAYUGA, DE VERA JUMALON

Address: 16F CITYLAND HERRERA TOWER, RUFINO
ST BEL-AIR CITY OF MAKATI NATIONAL CAPITAL
REGION NCR
Contact No.: 53104926 / 9157595420
TIN: Email:

CONSIGNEE: PARAISO, RENATO

And or / care of: /

Address: CICC 807 EDSA AVE DILIMAN CENTRAL QUEZON
CITY NATIONAL CAPITAL REGION NCR
Contact No.: 9000000000

Courier N-Pouch XL

Quantity : 1
Origin : MMA-SLZ05-CITYLAND HERRERA
Tran. Date : 10/01/2026 03:32:20 PM
Delivery Date : 10/02/2026
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-Off : 04:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 117.86
Supplies Fee : (0.00)
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
Demand Surcharge : 0.04
Total Sales/Unit Cost: 125.90
12% VAT : 15.10
Amount Due : 141.00
Discount : 0.00
Mode : CASH

Track your padala at:

www.lbcexpress.com

Talk to our Care Representative

Tel. : (632) 8858-5999

1-800-10-8585-999

*Only for PH outside NCR

Said to Contain : DOCS

LBC Express values your privacy. For more info, visit www.lbcexpress.com/privacy

SHIPPER WARRANTS THAT THE SHIPMENT HAS NO CASH INSIDE. CLAIMS OF CARGO ARE
LIMITED UP TO ACTUAL DECLARED VALUE ONLY.
I hereby agree to be bound with the terms and conditions written at the
back set forth by LBC EXPRESS

Let us know of your experience:

bit.ly/CSATPH

JOHN WINSTON ENRIQUEZ
Signature of Associate

DE GUZMAN MAYUGA, DE VERA JUMALON
Signature of Shipper

Invoice Series No : SLZ0510000000001 to SLZ0509999999999 BIR Final PTUM:FP102025-126-0559771-00000
BIR Accreditation No: 1260007021402025072404 Date Issued: 10/23/2025