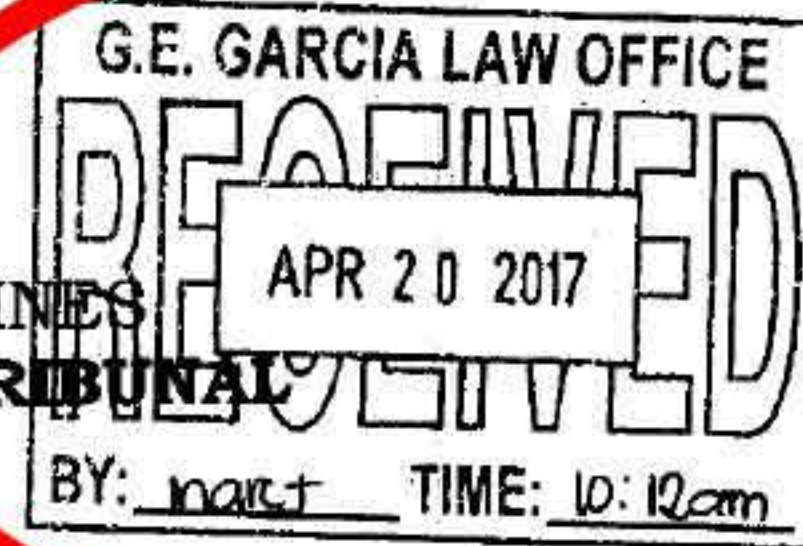


REPUBLIC OF THE PHILIPPINES  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
MANILA



FERDINAND "BONGBONG" R.  
MARCOS, JR.,  
*Protestant,*

- versus -

PET Case No. 005  
FOR: Election Protest  
Vice President

MARIA LEONOR "LENI DAANG  
MATUWID" G. ROBREDO,  
*Protestee.*

X-----X

**MOTION FOR LEAVE OF COURT  
TO FILE AND ADMIT THE HEREIN  
INCORPORATED REPLY TO PROTESTANT'S  
COMMENT/OPPOSITION**

**PROTESTEE**, through counsel, respectfully moves for leave of court that she be allowed to file the herein incorporated **Reply** to protestant's Comment/Opposition<sup>1</sup> (To the Motion for Reconsideration, *Pro Tanto* with Prayer to Set for Hearing dated 24 February 2017), and the same be admitted, thus:

1. Now it can be told. Protestant erroneously relied on certain decisions of the Supreme Court involving **local elective officials** decided **under the regime of manual elections** wherein the **strict requirement** that an election protest "shall state a detailed specification of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts" **was not yet existing**. Protestant conveniently forgot that the position involved in his election protest is that of the Vice-President and not the positions of a municipal mayor, councilor or governor of a province that he cited in his said Comment/Opposition and that the election herein was conducted under the 2016 automated system of election and not a manual election dating back in the 60's or 80's or late 90's.

<sup>1</sup> Copy received by protestee's counsel on March 30, 2017.



2. Except for the election protest of Legarda vs De Castro<sup>2</sup> which involved the position of the Vice-President which, as will be discussed later, is irrelevant to the instant election protest, the cases cited by protestant were decided under the old rules wherein a protest only needed the allegations pertaining to the proclamation of the protestee and that the protestant was a candidate voted for the contested office and the contested precincts.

3. The "detailed specification of the acts or commissions complained of" as strictly required under Rule 17 (d)<sup>3</sup> of the 2010 Rules of PET originated from **A. M. No. 07-4-15-SC**, Rules of Procedure in Election Contests Before the Court Involving Elective, Municipal and Barangay Officials which took effect on **May 15, 2007**. Thus, protestee cannot be blamed if she entertains the idea that protestant is trying to mislead the Honorable Tribunal by citing cases of election protest not yet covered by such strict requirement of "detailed specification of the acts or omissions complained of" and which cases, on their face, are not applicable to an election protest involving the Vice-Presidential position.

4. Hence, in the highest interest of justice, and so as not to put protestee in estoppel in questioning the cases cited by the protestant, protestee respectfully begs leave that she be allowed to file and, subsequently admit, the herein incorporated

### **REPLY TO PROTESTANT'S COMMENT/OPPOSITION**

(To the Motion for Reconsideration, *Pro Tanto*  
with Prayer to Set for Hearing dated 24 February 2017)

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<sup>2</sup> PET Case No. 003, 31 March 2005.

<sup>3</sup> Rule 17 (d) of the 2010 Rules of the Presidential Electoral Tribunal states:

*"Contents of the protest or petition. –*

*xxx*

(C) An election protest shall also state:

(a) that the protestant was a candidate who had duly filed a certificate of candidacy and had been voted for the same office.

(b) the total number of precincts of the region, province, or city concerned;

(c) the protested precincts and votes of the parties to the protest in such precincts per the Statement of Votes By Precinct or, if the votes of the parties are not specified, an explanation why the votes are not specified; and

**(d) a detailed specification of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts.**

**(n)"** [Emphasis supplied.]



5. The crux of protestee's motion for reconsideration *pro tanto* is the apparent failure of protestant to state in his election protest the **strict requirement** of "a detailed specification of the acts or omissions complained of showing the electoral frauds, anomalies, or irregularities in the protested precincts", which is a **new** provision of the 2010 Rules of this Tribunal under Rule 17(d). As stated, this provision had its original inception under Section 11, Rule 2 of **A. M. No. 07-4-15-SC**.

6. Before **A. M. No. 07-4-15-SC**, the only requirement for an election protest is that the protestant should be a candidate "who has presented a certificate of candidacy."<sup>4</sup> But subsequent decisions of the Supreme Court, taking the cue from the earlier 1917 case of Galang vs Miranda, GR 12118, February 23, 1917, required the allegations of other jurisdictional facts such as: that the protestant filed his COC; the date of protestee's proclamation; and that both parties were voted for the contested office. Section 1, Rule 20 of Comelec Rules of Procedure of 1993 required these jurisdictional facts in an election protest under its jurisdiction.

7. To be sure, except for the Legarda vs De Castro case cited by the protestant in his Comment/Opposition, the other cited cases involved positions of elective local government officials and decided during those days when the **strict requirement** of "detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts" had not yet been conceived.

8. Protestant cited Dayo vs Comelec and Gaasis<sup>5</sup>; Miguel vs Comelec and Lapuz<sup>6</sup>; Saquilayan vs Comelec and Jaro<sup>7</sup>; Panlilio vs Comelec and Pineda<sup>8</sup>; and Cagas vs Comelec and Bautista<sup>9</sup> to support his contention that his election protest complied with the **strict requirement** of "detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts" under Rule 17(d) of the PET Rules.

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<sup>4</sup> Section 174, RA 180 or the Revised Election Code, June 1, 1947.

<sup>5</sup> Par. 24, page 8, Protestant's Comment/Opposition

<sup>6</sup> Par. 25, page 8, Protestant's Comment/Opposition

<sup>7</sup> Par. 26, Page 11, Protestant's Comment/Opposition

<sup>8</sup> Par. 27, Page 14, Protestant's Comment/Opposition

<sup>9</sup> Par. 28, Page 15, Protestant's Comment/Opposition



9. But all these cases involved local elective officials and NOT the vice-president whose election case, like the president, is governed by the 2010 PET Rules. Election cases of local elective officials are governed by the Election Code and the Rules of Procedure of COMELEC, thus:

a) Dayo vs Comelec<sup>10</sup> – an election protest that involved the position of Councilor of Sampaloc, Quezon in the January 25, 1988 local election. It was governed by RA 6388 Election Code of 1971 where the said **strict requirement** of “detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts” under **2007 A. M. No. 07-4-15-SC** was not yet enforced.

b) Miguel vs Comelec<sup>11</sup> – involved the position of Mayor of Rizal, Nueva Ecija in the May 11, 1998 election, thus, governed by the Omnibus Election Code (BP 881), as amended, and the Comelec Rules of Procedure of 1993, where the said **strict requirement** of “detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts” under **2007 A. M. No. 07-4-15-SC** was not yet enforced.

c) Saquilayan vs Comelec<sup>12</sup> – involved the position of Mayor of Imus, Cavite in the May 14, 2001 local elections, governed by the Omnibus Election Code (BP 881), as amended, and the Comelec Rules of Procedure of 1993, where the said **strict requirement** of “detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts” under **2007 A. M. No. 07-4-15-SC** was not yet enforced.

d) Panlilio vs Comelec<sup>13</sup> – involved the position of Governor of Pampanga in the May 14, 2007 elections. The main issue in this case was the non-referral by the Second Division of Panlilio’s Motion for Reconsideration of said Division’s Order to the Comelec En Banc. While the Supreme Court ruled on the sufficiency in form and substance of the election protest, the contest between Panlilio and Pineda for the position of Governor of Pampanga was rendered moot and academic when the term of the governor elected in 2007 ended before the finality of the decision.

<sup>10</sup> G.R. No. 94681, July 18, 1991.

<sup>11</sup> G.R. No. 136966, July 5, 2007.

<sup>12</sup> G.R. No. 157249, November 28, 2003.

<sup>13</sup> G.R. No. 181478, July 15, 2009.



e) Cagas vs Comelec<sup>14</sup> – involved the position of Governor of the Province of Davao del Sur in the May 14, 2010 elections wherein the **strict requirement** of “detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts” under Comelec Resolution No. 8804<sup>15</sup> dated 22 March 2010 **was already in place**. But Cagas case is the **best and classic example of the evil sought to be prevented** by the said strict requirement. For in Cagas, it showed how a loosely worded, bare, scatter-shot allegations in an election protest could be used as an instrument to tamper with the ballot boxes and their contents for purposes of revision and recount of ballots.

10. For when the said **strict requirement** of “detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts” under **2007 A. M. No. 07-4-15-SC** was adopted, the framers thereof had in mind the proliferation of baseless and frivolous election protest instituted by election losers who could not accept defeat in good grace. Thus, as early as in the case of Guiao vs Comelec<sup>16</sup>, this Court already took notice of “the propensity of losing candidates to put up all sorts of obstacles in an open display of unwillingness to accept defeat” which was reiterated in Farinas vs Comelec<sup>17</sup> that an annulment of proclamation without hearing “would encourage the filing of baseless petitions not only to the damage and prejudice of winning candidates but also to the frustration of the sovereign will of the people.”

11. Precisely, said strict requirement under **2007 A. M. No. 07-4-15-SC** was envisioned at that time to prevent such baseless and frivolous election protests which were sources of corruption in many trial courts handling election protests or where dubious decisions were rendered by these trial courts.

12. Thus, it is very clear that the cases cited by the protestant are not applicable to the case at bar. If at all, they only exposed the fact that his election protest does not contain said **strict requirement** of “detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts” since

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<sup>14</sup> G.R. No. 194139, January 24, 2012.

<sup>15</sup> In Re: COMELEC Rules of Procedure on Disputes in an Automated Election System in Connection with the May 10, 2010 Elections.

<sup>16</sup> G.R. No. L-65056, July 5, 1985.

<sup>17</sup> G.R. No. 81763, March 10, 1988 (Minute Resolution).



said cases, as stated, transpired when said strict requirement for an election protest was not yet in existence, aside from the fact that they all pertained to local elective positions.

13. The case of *Legarda vs De Castro*<sup>18</sup> will not likewise help protestant's weak and dismissible election protest. *Legarda* was decided under the 2005 PET Rules where the said 'strict requirement' for an election protest was not yet included. Furthermore, the *Legarda* protest is another example of how a protest could be so loosely worded to annul results in 9,007 precincts from 6 provinces; one city and 5 municipalities and revision of ballots from 124,404 but only to end up with protestant withdrawing all but two municipalities where the number of votes involved, as found by the PET, would not affect the results of the election. At the end, it was dismissed by the PET for its utter lack of merit, but only after the protestee was forced to unnecessarily spend for such unmeritorious protest. Furthermore, Legarda's protest was dismissed as she was deemed to have **abandoned said protest when she ran, won and assumed the Office of Senator in the May 2007 elections.**

14. Precisely, this **strict requirement** of "detailed specifications of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts" had been included now in all rules on election protest to prevent the proliferation of such baseless and frivolous protests which are merely intended to harass the winners for the loser's unsportsmanlike manner of not conceding defeat in good grace.

15. Since the inception of this **strict requirement** several election protests in the local level had been dismissed by both the trial courts and COMELEC for failure to comply with said requirement and their actions sustained by the Supreme Court<sup>19</sup>. Thus, the Supreme Court which now acts as the PET in this case should be consistent in its ruling. Otherwise, it will change the course of all election cases now pending before the trial courts and other electoral tribunals if the Supreme Court's decisions dismissing election protests not complying with the said "strict requirement of detailed specifications of the acts or omissions complained of" are reversed and set aside in this election protest.

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<sup>18</sup> Par. 20, Page 7 Protestant's Comment/Opposition.

<sup>19</sup> *Aguillo vs Comelec*, G. R. No. 197975-76, March 19, 2012, Extended Minute Resolution; *Sy vs. Macias*, G.R. No. 184942, 23 March 2013.



17. Only recently, COMELEC dismissed the election protest involving the elected mayor of Makati City in the 2016 elections also for failure of the protestant therein to comply with said strict requirement of a detailed specification of the acts or omissions complained of, thus:

Section 255 of the Omnibus Election Code provides for two cases where the examination and recounts of ballots can be had: 1) by petition of any interested party where the allegations of the protestant warrant revision of ballots; or 2) whenever in the opinion of the court the interest of justice requires it. This must be tempered by the abovementioned rules. **For the allegation of a protest to warrant the examination for the ballots, the same must contain a detailed specification is however interpreted by the Supreme Court. It must be pointed out that the requirement of detailed specification is not limited to manual elections,** A.M. No. 07-4-15 SC (*Rules of Procedure in Election Contests before the Court Involving Elective Municipal and Barangay Officials*),<sup>11</sup> as such requirements are reflected in, **A.M. No. 10-4-1 SC (2010 Rules of Procedure for Municipal Election Contests)** and Comelec Resolution No. 8804, rules observed in automated elections: The commission (First Division) sees no reason why the same interpretation should not be applied in the case at bar.

**The rule on specificity of the acts or omissions detailing electoral fraud or irregularity is purposely crafted to prevent the tendency of prolonging or delaying election protest which cast doubt to the validity of the proclamation of the elected officials. The Commission (First Division) cannot sanction the emergence of question as to the integrity of the assumption of a public official without showing that there are causes for such question. These causes must be stated with utmost particularity as to disturb the very results of the elections this Commission (First Division) considers sacred. It is only clear showing of grounds necessitating the opening of the ballot boxes that the Commission (First Division) should lift the presumption of**



**regularity in the conduct of the elections.** The Protestant did not show required specific cause why this election protest must continue.<sup>20</sup>

16. As protestee has stated and extensively argued in our Motion for Reconsideration which is the subject of protestant's Comment/Opposition, there were several provinces protested by protestant consisting of hundreds of municipalities/cities, but protestant limited his allegations of frauds and irregularities to a handful of these local government units as described in protestee's prayer in her said Motion for Reconsideration. Thus, all we are asking is for this Honorable Tribunal to dismiss the election protest insofar as the areas, municipalities or cities where no such specific detailed allegation of frauds and irregularities were stated as discussed in her motion for reconsideration.

17. Protestant also accused protestee of having a "misplaced argument" and confusing the meaning of "ultimate facts" and "evidentiary facts". But the problem with the cases cited by protestant is that they all pertained to civil cases where there is no such requirement of a "detailed specification of the acts or omissions complained of" in the initiatory pleading. Protestant cited the Rules of Evidence of the PET Rules. But we are not on the rules on evidence but the issue here is the rules on what an election protest should state.

18. The grounds cited by protestant in his protest were merely scattershot allegations of alleged anomalies during the election. As stated earlier, there is **NO detailed specification** of the acts or omissions complained of showing the electoral frauds, anomalies or irregularities in the protested precincts. **Protestant will merely "fish for evidence" or will be in a fishing expedition in asking for a revision or re-appreciation of the ballots.**

19. By its nature, an election protest should **mathematically demonstrate that protestant will be able to overcome the vote-lead of the protestee. In this case, protestant cannot even allege how many ballots he could recover in a particular precinct; what specific act was committed in a specific precinct that could justify his recovery of a ballot he claimed was not allegedly credited in his favor; or any specific act in a specific precinct that could justify the exclusion of a ballot of the protestee.**

<sup>20</sup> Pena vs Binay, EPC No. 2016-14, Comelec, 20 September 2016.



**An election protest that merely tends to cast doubt on the elections, without specifically alleging any kind of anomaly, irregularity or fraud that would be enough to affect the results of the elections, is clearly a protest that is insufficient in form and content.**

20. Thus, it is an insult upon one's intelligence and competence to believe protestant's allegations that the following **uniform and identical acts of alleged** frauds and irregularities happened **AT THE SAME TIME** in following big provinces and highly urbanized cities. Protestant, in his bare and scattershot allegations said:

“As for the protested clustered precincts of Cebu Province, Leyte, Negros Occidental, Negros Oriental, Masbate, Zamboanga del Sur, Zamboanga del Norte, Bukidnon, Western Samar, Misamis Oriental, Camarines Sur, 2<sup>nd</sup> District of Northern Samar, Palawan, Albay, Zamboanga Sibugay, Misamis Occidental, Pangasinan, Isabela, Iloilo City, Bacolod City, Cebu City, Lapu-Lapu City and Zamboanga City, protestant Marcos **complained** of the prevalence of violence, intimidation, vote-buying, substitution of voters/presence of flying voters, misreading of ballots, malfunctioning and tampered VCMs and CCS, pre-loaded SD cards, and an abnormally high turnout of unaccounted votes/undervotes for the position of Vice-President in these contested areas during the last elections.”<sup>21</sup>

21. Again, protestant is insulting our intelligence and competence. How could all of these **uniform and identical acts** of alleged frauds and anomalies happened **ALL AT THE SAME TIME AT THE SAID BIG PROVINCES AND HIGHLY URBANIZED CITIES** without even a whimper of protest from any candidate or political party? It could have caused a pandemonium of sort if such an event had happened as described by the protestant. **It could have been a big media event. But no such thing was ever reported in the media nor by the Comelec. As a matter of fact, the Comelec said that the 2016 elections was relatively more peaceful and orderly than the 2010 and 2013 elections.**<sup>22</sup> Surely, this is the reason why the rules now requires a more detailed

<sup>21</sup> Par. 10, Protestant's Comment/Opposition.

<sup>22</sup> <http://news.abs-cbn.com/halalan2016/nation/05/10/16/comelec-chief-2016-polls-relatively-more-peaceful-orderly>.



specification of “**where, how, when, who**” these alleged acts transpired.

22. Thus, protestee reiterates that what are contained in the protestant’s protest are general allegations, or more accurately **suspicious or conjectures** of fraud, anomalies and irregularities. Protestant did not specifically state in his Protest how the various alleged irregularities or anomalies he alleged affected the results of the elections. There is, therefore, no causal relationship between the alleged fraud and the eventual results of the elections that protestant impugns. His failure to so explain should not be taken lightly as it is a ground for dismissal in that it renders the protest insufficient in form and content. Indeed, these allegations are clearly make-believe anomalies that not protestant or his watchers could possibly have observed or discovered.

23. With the advent of the automated system of elections, it is high time that scattershot and fishing-expedition protests such as the subject election protest be curtailed lest the country’s gains in terms of relatively peaceful elections on account of the quick determination of the results be wasted on account of frivolous election protests such as protestant’s.

### **PRAYER**

WHEREFORE, in view of the foregoing, it is respectfully prayed that protestee be allowed to file the herein incorporated Reply to protestant’s Comment/Opposition, and said Reply be duly admitted as part and parcel of protestee’s Motion for Reconsideration dated 24 February 2017. Protestee hereby reiterates her prayer that:

a) On Protestant’s Protest for **Annulment of Election Results in the Province of Lanao del Sur**, the same should be limited to the **Municipalities of Bacolod-Kalawi, Pagayawan, Lumbaca Unayan and Marawi City** and the **Protest insofar as the remaining 34 municipalities of Lanao Del Sur** wherein no allegations or narrations of “ultimate facts” on poll irregularities and anomalies be **DISMISSED** for insufficiency in form and substance.

b) On Protestant’s Protest for **Annulment of Election Results in the Province of Maguindanao**, the same should be limited to the **Municipality of Datu Saudi Ampatuan**



**and the Protest insofar as the remaining 35 municipalities of Maguindanao** wherein no allegations or narrations of "ultimate facts" on poll irregularities and anomalies be DISMISSED for insufficiency in form and substance.

c) On Protestant's Protest for **Annulment of Election Results in the Province of Basilan**, the same should be limited to the **Municipalities of Tuburan, Akbar and Sumisip, and Lamitan City** and the Protest insofar as the **remaining 8 municipalities of Basilan** wherein no allegations or narrations of "ultimate facts" on poll irregularities and anomalies be DISMISSED for insufficiency in form and substance.

In all these provinces, the protestant be DIRECTED to specifically identify the SPECIFIC CLUSTERED PRECINCTS where such alleged poll irregularities or anomalies occurred which could be the subject of the annulment of election results.

d) **On Protestant's protest for Revision or Recount of Ballots** the same should be limited to the municipalities or cities wherein the protestant attached affidavits of his alleged witnesses and the protest insofar as the other remaining municipalities and cities where no such affidavits or narration of "ultimate facts on the alleged irregularities and anomalies" were alleged or contained SHOULD BE DISMISSED for insufficiency in form and substance, as discussed in Items 1-20, inclusive, under the heading **"REVISION AND RECOUNT OF BALLOTS (PROVINCES)"**.

In all these provinces, the protestant be DIRECTED to specifically identify the SPECIFIC CLUSTERED PRECINCTS where such alleged poll irregularities or anomalies occurred which could be the subject of the said revision and recount of ballots.

e) On protestant's protest for revision/recount of ballots from the five (5) highly urbanized cities (HUCs), namely: Iloilo City, Bacolod City, Cebu City, Lapu-Lapu City and Zamboanga City, the protestant should be DIRECTED to identify the SPECIFIC CLUSTERED PRECINCTS, out of the **2,537 clustered precincts** of these five (5) HUCs, subject of his revision and recount of ballots in these areas.



Protestee Robredo prays for such other reliefs as may be just and equitable under the premises.

Pasig City for Manila. 11 April 2017.

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*Lead Counsel for Protestee*

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By

  
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## **REQUEST**

**THE SECRETARY OF THE TRIBUNAL  
PRESIDENTIAL ELECTORAL TRIBUNAL  
MANILA**

Greetings:

Please submit the foregoing "*Motion for Leave of Court to File and Admit the herein Incorporated Reply to Protestant's Comment/ Opposition*" for the consideration and approval of the Honorable Tribunal immediately upon receipt hereof without need for oral arguments.

  
**MARIA BERNADETTE V. SARDILLO**

## **NOTICE OF HEARING**

**ATTY. GEORGE ERWIN M. GARCIA  
ATTY. JOAN M. PADILLA  
G. E GARCIA LAW OFFICE**  
*Lead Counsel for Protestant*  
Ground Floor Laiko Building  
372 Cabildo Street, Intramuros,  
1002 Manila

**OFFICE OF THE SOLICITOR GENERAL**  
134 Amorsolo Street  
Legaspi Village, 1229 Makati City

Please take note that the undersigned counsel will submit the foregoing "*Motion for Leave of Court to File and Admit the herein Incorporated Reply to Protestant's Comment/ Opposition*" for the Honorable Tribunal's action and consideration upon receipt hereof without need for oral arguments.

  
**MARIA BERNADETTE V. SARDILLO**



Copy furnished:

**ATTY. GEORGE ERWIN M. GARCIA**

**ATTY. JOAN M. PADILLA**

**G. E GARCIA LAW OFFICE**

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**EXPLANATION**

Due to unavailability of messengers and the distance of the parties, a copy of the herein motion was each sent to the above-named parties by registered mail.

  
**MARIA BERNADETTE V. SARDILLO**



Republic of the Philippines )  
Pasig City )

**VERIFIED DECLARATION OF COMPLIANCE WITH THE  
EFFICIENT USE OF PAPER RULE**


I, **KWELL SUYINN M. ZARASATE**, hereby declare that the Motion for Leave of Court to File and Admit the herein Incorporated Reply to Protestant's Comment/ Opposition submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and true copies of the Motion for Leave of Court to File and Admit the herein Incorporated Reply to Protestant's Comment/ Opposition filed with the Presidential Electoral Tribunal.

Pasig City. 11 April 2017.

  
**KWELL SUYINN M. ZARASATE**  
Secretary  
Sardillo Sardillo Salom Law Office

**SUBSCRIBED AND SWORN TO BEFORE ME**, a notary public in and for Pasig City, this 11th day of April 2017 by affiant **KWELL SUYINN M. ZARASATE** who is personally known to me, and appeared with her SSS ID with No. 33-9056255-6 issued by Social Security System, known to me as the same person who personally signed the foregoing attestation before me and acknowledged that she executed the same.

Doc. No. 308 ;  
Page No. 74 ;  
Book No. 09 ;  
Series of 2017.

  
**GAUDENCIO A. BARBOZA, JR.**  
NOTARY PUBLIC  
Cities of Pasig, San Juan and  
in the Municipality of Pateros, Metro Manila  
Until December 31, 2018  
JTP No. A-321/144 / 01-03-17 Taguig City  
ISP No. 1058940 / 11-03-16 RSM  
ROLL No. 41069  
MCLE Comp. V. 0021431 / May 02, 2015  
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Shaw Blvd. Brgy. San Antonio, Pasig City  
Appointment No. 26