

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

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

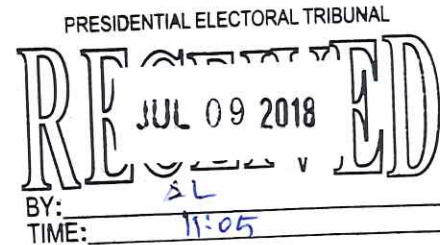
Protestant,

-versus-

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

Protestee.

X - - - - - X



PET Case No. 005

For: Election Protest
Vice-President

MANIFESTATION OF GRAVE CONCERN
with EXTREMELY URGENT MOTION TO
INVESTIGATE

[RE: PET HEAD REVISORS AND OTHER PET PERSONNEL
FRATERNIZING WITH PROTESTEE'S REVISOR]

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.**
("protestant Marcos"), through the undersigned counsels, unto this
Honorable Presidential Electoral Tribunal ("PET"), most respectfully
alleges the following:

1. Protestant Marcos received information that on **Friday, 22 June 2018**, there was an "outing" at "**3J's Resort**" located at Lot 11, Barangay Pansol, Calamba City, Laguna which was attended by a **party revisor for the protestee, Maria Leonor "Leni Daang Matuwid" G. Robredo ("Robredo")**, **TOGETHER with twenty-four (24) Head Revisors, Alternate Head Revisor, Appraiser, Ballot Box Custodians/Handlers and Chief Tabulator of this Honorable Tribunal.**

2. From the twenty-five attendees of the said **"pansol outing"** of the **PET** staff and the protestee's party revisor, the following were identified to be among those who joined the aforementioned activity, thus:

Name	Designation
1. OSMUNDO ABUYUAN	Protestee's Party Revisor
2. REYCARD CASTRO	PET Chief Tabulator
3. HAZEL MAGSIPOC	PET Head Revisor
4. MOHAMMAD DISOMANGCOP	PET Head Revisor
5. JENNIFER PABLO	PET Head Revisor
6. MICHAER REBOSURA	PET Head Revisor
7. CHRISTINE ENRIQUEZ	PET Head Revisor
8. NORIESEL LALAMUNAN	PET Head Revisor
9. IRENE CANADA	PET Head Revisor
10. PRINCESS BONETIVO	PET Head Revisor
11. MARIA KATRIN "CHECHE" ROSALES	PET Head Revisor
12. HANNAH PAULINE MEDRANO	PET Head Revisor
13. JULIUS TUMALAD	PET Alternate Head Revisor
14. ELLAINE FRANCISCO	PET Appraiser
15. KENO MORALEDA	PET Head Ballot Box Custodian
16. MARTIN SANTOS	PET Ballot Box Custodian
17. EDWARD ROQUE	PET Ballot Box Custodian
18. BRYAN PUNTERO	PET Ballot Box Custodian
19. ELIJAH MIKAELSON	PET Ballot Box Custodian
20. MEL DARIEN BUENSALIDO	PET Ballot Box Custodian
21. ROGENE AGUDELO	PET Ballot Box Custodian

3. The **"pansol outing"** was discovered after the photos thereof were **publicly posted by Maria Katrina Rosales ("Rosales") on her Facebook account on the morning of Sunday, 24 June 2018**. Screenshots¹ from her Facebook account, which includes the photos of the said outing, are shown below:

¹ Name tags were supplied for reference and identification.



LENI'S REVISOR

PET STAFF



1. OSMUNDO ABUYUAN
2. HAZEL MAGSIPOC
3. MOHAMMAD DISOMANGCOP
4. CHRISTINE ENRIQUEZ
5. JENNIFER PABLO
6. JULIUS TUMALAD
7. NORIESEL LALAMUNAN
8. IRENE CANADA
9. PRINCESS BONETIVO
10. HANNAH MEDRANO
11. MARIA KATRIN ROSALES
12. ELLAINE FRANCISCO
13. KENO MORALEDA
14. ???
15. MARTIN SANTOS
16. EDWARD ROQUE
17. BRYAN PUNTERO
18. ELIJAH MIKAELSON
19. ROGENE AGUDELO
20. MEL DARIEN BUENSALIDO

- LENI'S REVISOR**
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
ALTERNATE HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
PET APPRAISER
HEAD PET CUSTODIAN
- PET CUSTODIAN**
PET CUSTODIAN
PET CUSTODIAN
PET CUSTODIAN
PET CUSTODIAN
PET CUSTODIAN

LENI'S REVISOR

PET STAFF



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- LENI'S REVISOR**
PET HEAD REVISOR
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ALTERNATE HEAD REVISOR
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PET CUSTODIAN
PET CUSTODIAN
PET CUSTODIAN

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PET STAFF



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12. PRINCESS BONETIVO
13. MARIA KATRIN ROSALES
14. EDWARD ROQUE

- LENI'S REVISOR**
PET CHIEF TABULATOR
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
ALTERNATE HEAD REVISOR
PET HEAD REVISOR
PET APPRAISER
PET HEAD REVISOR
PET HEAD REVISOR
PET CUSTODIAN

LENI'S REVISOR

PET STAFF



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3. ELLAINE FRANCISCO
4. HANNAH MEDRANO
5. ???
6. BRYAN PUNTERO
7. EDWARD ROQUE

- LENI'S REVISOR**
PET HEAD REVISOR
PET APPRAISER
PET HEAD REVISOR

- PET CUSTODIAN**
PET CUSTODIAN

LENI'S REVISOR

PET STAFF



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PET HEAD REVISOR
PET APPRAISER
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LENI'S REVISOR

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PET CHIEF TABULATOR
PET HEAD REVISOR
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PET HEAD REVISOR
PET HEAD REVISOR
PET HEAD REVISOR
ALTERNATE HEAD REVISOR

PET CUSTODIAN

¹ Name tags were supplied for reference and identification.

4. As clearly shown from the above photos, **Osmundo "Ritchie" Abuyuan ("Abuyuan")**, a party revisor for the protestee, attended the "**pansol outing**" and was obviously fraternizing with the above-identified PET personnel.

5. In an attempt to rectify her mistake of publicly posting the incriminating photos of their "**pansol outing**" on her Facebook account, **PET** Head Revisor Rosales deleted the said photos from her Facebook account on **Monday, 2 July 2018**.

6. Upon verification with "**3J's Resort**," it was **confirmed** that there indeed was a "**pansol outing**" of the PET personnel and protestee's revisor at their resort on 22 June 2018.

7. The “**pansol outing**” of the **PET** personnel and protestee’s revisor was booked by Mel Darien Buensalido, PET Ballot Box Custodian, for 22 June 2018 as shown by a photo of the booking calendar of “**3J’s Resort**”, thus:

WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		1 Sir Darien 7AM to 7PM Day tour Lealie June 1-2 7PM - 6AM overnight	2 Sir Darien Arline Solola June 2 to 3 7PM - overnight 6AM
6	7	8 Richard June 8-9 7PM - overnight 6AM	9 Arlyn Edio June 9-10 7PM - 22HRS 15PM JMF over Doubtless June 9 8AM - 5PM
13	14 Alfrido Mondal June 14 5PM - Doubtless 5PM LA Lopez June 14-15 7PM - 5PM 22HRS	15 Diana May June 15-16 2PM - 6AM - overnight	16 Ana June 16, 2018 9AM - 5PM - Doubtless Oily Sabambel June 16-17 7PM - 5PM 22HRS
20	21	22 Mel Darien June 22-23 7PM - 22HRS 6PM	23 Rebecca Luz June 23-24 7PM - overnight 6AM
27	28	29 Fern June 29-30 7PM - 7AM	30 Lilia Grace June 30 - July 1 8AM - 6AM 22HRS

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8. For all intents and purposes, the above-named **PET** personnel, composed of Head Revisors, Alternate Head Revisor, Appraiser, Ballot Box Custodians/Handlers and Chief Tabulator, considered officers of the Court and personnel of this Honorable Tribunal.

9. All Court personnel, from the lowliest employee to the Clerk of Court of any position lower than that of a Judge or Justice, are involved in the dispensation of justice, and parties seeking redress from the courts for grievances look upon Court personnel as part of the judiciary.²

10. Under the **Code of Conduct for Court Personnel**, "in performing their duties and responsibilities, Court personnel serve as sentinels of justice and any act of impropriety on their part immeasurably affects the honor and dignity of the Judiciary and the people's confidence in it."³

11. The Supreme Court has ruled that "in the case of public servants who are in the judiciary, their conduct and behavior, from the presiding judge to the lowliest clerk, must not only be characterized by propriety and decorum, but above all else, must be above suspicion."⁴

12. In *Virginia E. Burgos v. Josefina R. Aquino*,⁵ it was further held that the "Code of Judicial Ethics mandates that **the conduct of Court personnel must be free from any whiff of impropriety**, not only with respect to his duties in the judicial branch but also to his behavior outside the Court as a private individual."

13. Fraternizing with the party revisor for the protestee is obviously **PROHIBITED** by this Honorable Tribunal since this act is **PROSCRIBED** not only by the **Code of Conduct for Court Personnel** but also by the **Canon of Judicial Ethics**.

² A.M. No. 03-06-13-SC, Code of Conduct for Court Personnel, emphasis and underscoring supplied.

³ *Id.*, emphasis and underscoring supplied.

⁴ *Lacuata v. Bautista*, A.M. No. P-94-1005, 12 August 1994, 235 SCRA 290, emphasis and underscoring supplied.

⁵ A.M. No. P-94-1081, 25 October 1995, emphasis and underscoring supplied.

14. **Section 1, Canon V** of the **Code of Conduct for Court Personnel** expressly provides that all provisions of law, Civil Service rules, and issuances of the Supreme Court governing or regulating the conduct of public officers and employees applicable to the judiciary are deemed incorporated into the **Code of Conduct for Court Personnel**.

15. Protestant Marcos is obviously **dismayed** and tremendously **demoralized** by this incident. He is stunned that there appears to be a **CONSPIRACY** between the camp of the protestee, represented by **Abuyuan**, and these PET personnel.

16. Protestant Marcos cannot help but wonder if the ongoing judicial recount and revision proceeding is **COMPROMISED** given that the "**pansol outing**" was attended by a number of **PET** personnel who appear to be in cahoots with the protestee's camp.

17. These **PET** personnel, particularly the Head Revisors and the Alternate Head Revisor, preside over their respective Revision Committees. Their position allows them to **control** the conduct of the judicial recount and revision of ballots in Marcos' election protest. In fact, these Head Revisors and the Alternate Head Revisor are in charge of **initially determining** whether the ballots found inside the ballots are valid, rejected or stray. They are likewise mandated to determine if the protested ballots **comply with the 50% shading threshold**, otherwise, the same shall be deemed to be stray votes.

18. This being the case, it is highly plausible that the camp of the protestee, through her party revisor **Abuyuan**, already infiltrated and curried favor with these **PET** personnel in order to **manipulate, influence and/ or control** the revision proceedings and maneuver the revision results in her favor.

19. Consequently, it is imperative for this Honorable Tribunal to immediately **INVESTIGATE** this incident and impose the appropriate **SANCTIONS** on these **PET** personnel, the protestee and her party revisor.

PRAYER

ACCORDINGLY, it is most respectfully prayed that this Honorable Tribunal to **INVESTIGATE** the "**pansol outing**" of the **PET** personnel and protestee's revisor and take **NOTE** of the foregoing *Manifestation of Grave Concern*.

Other reliefs, just and equitable under the premises, are also prayed for.

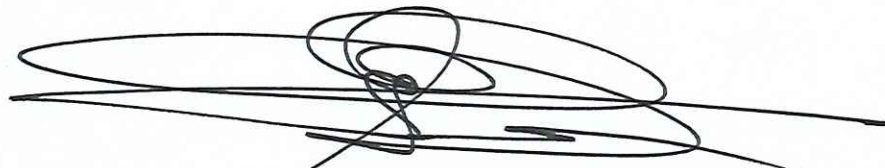
City of Manila, Philippines, **9 July 2018**.


FERDINAND "BONGBONG" R. MARCOS, JR.
Protestant

- assisted by -

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By:



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Copies furnished:

ATTY. ROMULO B. MACALINTAL

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THE SOLICITOR GENERAL

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COMMISSION ON ELECTIONS

Law Department

8th Floor, Palacio Del Gobernador

Intramuros, Manila

: 1096074554022

EXPLANATION

[Pursuant to Rule 30 and 31 of the PET Rules in relation to Section 11, Rule 13
of the 1997 Rules of Civil Procedure]

Copies of the foregoing *Manifestation of Grave Concern with
Extremely Urgent Motion to Investigate* were served to the above-
mentioned parties by registered mail, personal service being
impractical due to distance, time and manpower constraints.



GEORGE ERWIN M. GARCIA

AFFIDAVIT OF SERVICE

(Revised as of April 1, 1994)

I, **Jerry C. Guevarra**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, after being duly sworn, do hereby depose and say:

That on July 9, 2018, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

"MANIFESTATION OF GRAVE CONCERN with EXTREMELY URGENT MOTION TO INVESTIGATE"

[RE: PET HEAD REVISORS AND OTHER PET PERSONNEL
FRATERNIZING WITH PROTESTEE'S REVISOR]

In **PET Case No. 005** entitled "**FERDINAND 'BONGBONG' R. MARCOS, JR.,** *Protestant*, -versus- **MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO, Protestee**", pursuant to Sections 3, 4, 5 and 10, Rule 13 of the Rules of Court, as follows:

By Registered Mail:

ATTY. ROMULO B. MACALINTAL
c/o Sardillo Sardillo Salom Law Office
Unit 802, Taipan Place, F. Ortigas Avenue
Ortigas Center, Pasig City

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

COMMISSION ON ELECTIONS
Law Department
8th Floor, Palacio Del Gobernador
Intramuros, Manila

R. R. Nos.

RD 955 921 57872

TD 955 921 58122

TD 960 745 54022

By depositing a copy at the post office in Manila, as evidenced by Registry Receipt(s) No(s) and indicated after the name(s) of the addressee(s), and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered.

July 9, 2018, Manila, Philippines.

JERRY C. GUEVARRA
Affiant

SUBSCRIBED AND SWORN to before me this JUL 09 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 489
Page No. 97
Book No. X

ATTY. RAUL R. MONTINO
NOTARY PUBLIC
UNTIL DECEMBER 31, 2019
PTR NO. 6979843-2018
PD 12723, 17 APR 2018
IBP LIFETIME NO. 012899

VERIFIED DECLARATION

I, **JERRY C. GUEVARRA**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, hereby declare that the document/s (and annexes thereof) hereto submitted electronically in accordance with the Efficient use of Paper Rule is/are complete and true copy/ies of the document/s **"MANIFESTATION OF GRAVE CONCERN with EXTREMELY URGENT MOTION TO INVESTIGATE** [RE: PET HEAD REVISORS AND OTHER PET PERSONNEL FRATERNIZING WITH PROTESTEE'S REVISOR]" in **PET Case No. 005** entitled **FERDINAND 'BONGBONG' R. MARCOS, JR., Protestant, -versus- MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO, Protestee,** filed with the Presidential Electoral Tribunal.

Signature: _____

Printed Name: **Jerry C. Guevarra**

Position: Staff

Date: July 9, 2018

SUBSCRIBED AND SWORN to before me this JUL 09 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

ATTY. RAUL R. MONTINO

NOTARY PUBLIC

UNTIL DECEMBER 31, 2019

PTR NO. 6979843-2018

PD-12725, 12 MANILA

Person Administering Oath

SCROLL NO. 57289

MCLE COMP. NO. V-0019704

UNIT 2A 6818 EATERIO

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INTRAMUROS, MANILA 1002

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