

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
 Manila

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

Protestant,

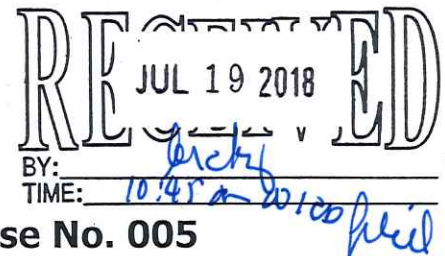
-versus-

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

Protestee.

X - - - - -X

PRESIDENTIAL ELECTORAL TRIBUNAL



PET Case No. 005

For: Election Protest
 Vice-President

STRONG OPPOSITION

[ON THE USE OF DECRYPTED BALLOT IMAGES FOR THE JUDICIAL
 REVISION AND RECOUNT OF BALLOTS FOR THE PILOT PROTESTED
 PRECINCTS SUBJECT OF THIS ELECTION PROTEST]

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. The undersigned counsel for protestant Marcos received a
 copy of *Resolution* dated 10 July 2018, which includes among others a
 directive from this Honorable Tribunal to APPROVE the
 recommendation to SUSPEND the revision proceedings and to refer to
 decrypted images re: Clustered Precinct No. 22 (Precincts 0050A,
 0051A and 0052A), Brgy. Puerto Princesa, Municipality of Barotac
 Viejo, Iloilo.

2. Protestant Marcos maintains his vehement opposition and
 continued objection to the use of the decrypted images in lieu of the
 original paper ballots in connection with the judicial recount and
 revision of ballots for the pilot protested precincts subject of this
 election protest.

3. As mentioned in our previous *Strong Manifestation with
 Motion* dated **5 July 2018**, this Honorable Tribunal cannot use the
 decrypted ballot images in the aforementioned precincts for purposes

of the judicial recount and revision proceedings in this case because the decrypted ballot images are **COMPROMISED**.

4. In fact, even before the commencement of the revision proceedings, protestant Marcos had already expressed his reservations on the use of the decrypted ballot images from the pilot protested provinces of Iloilo, Camarines Sur and even Negros Oriental as it appears that the integrity thereof is **DUBIOUS** and **HIGHLY QUESTIONABLE**.

5. It is undisputed that the original paper ballots used during the 2016 elections **DO NOT CONTAIN SQUARES**. Interestingly, however, a review of the decrypted ballot images from the pilot protested provinces of Iloilo, Camarines Sur and Negros Oriental confirms the presence of squares on the decrypted ballot images, specifically on the oval intended for protestee Robredo.

6. The presence of these squares on the oval intended for protestee Robredo certainly proves that the decrypted ballot images are **NOT FAITHFUL IMAGES OF THE ORIGINAL PAPER BALLOTS USED DURING THE 2016 ELECTIONS**. Hence, the same cannot be relied upon for purposes of the judicial recount and revision proceedings.

7. Consequently, protestant Marcos is compelled to oppose the directive of this Honorable Tribunal on the use of the decrypted ballot images from the pilot protested provinces of Iloilo and Camarines Sur for purposes of the judicial recount and revision proceedings in this case.

8. Protestant Marcos reserves the right to submit a more exhaustive discussion on this matter in a separate pleading.

PRAYER

ACCORDINGLY, it is most respectfully prayed of this Honorable Tribunal to take **NOTE** of the foregoing *Strong Opposition*.

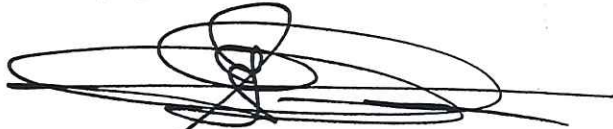
Other reliefs, just and equitable under the premises, are also prayed for.

City of Manila, Philippines, **16 July 2018.**

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By:



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R.R. #:

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COMMISSION ON ELECTIONS

Law Department
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Intramuros, Manila

RD 904 521 868 22

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 *Strong Opposition* 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 19, 2018, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

"STRONG OPPOSITION"

[ON THE USE OF DECRYPTED BALLOT IMAGES FOR THE JUDICIAL REVISION AND RECOUNT OF BALLOTS FOR THE PILOT PROTESTED PRECINCTS SUBJECT OF THIS ELECTION PROTEST]

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

R. R. Nos.

RD 967964258 ZC

RD 967964261 ZC

RD 904521868 ZC

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.

JUL 19 2018
July 19, 2018, Manila, Philippines.

JERRY C. GUEVARRA

Affiant

JUL 19 2018

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

Doc. No. 544
Page No. 9
Book No. X1
Series of 2018.

ATTY. RAUL R. MONTINO
NOTARY PUBLIC
UNTIL DECEMBER 31, 2018
PTR NO. 6979843-2018
P.O. 2017 MANILA
IBP LIFETIME NO. 012899
SCROLL NO. 57289
MCLE COMP. NO. V-0019704
UNIT 2A 681 BEATERIO
COR. MAGALLANES STS.
INTRAMUROS, MANILA 1001

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 **"STRONG OPPOSITION [ON THE USE OF DECRYPTED BALLOT IMAGES FOR THE JUDICIAL REVISION AND RECOUNT OF BALLOTS FOR THE PILOT PROTESTED PRECINCTS OF THIS ELECTION PROTEST]"** 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 19, 2018

SUBSCRIBED AND SWORN to before me this JUL 19 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 645 ;
Page No. 9 ;
Book No. x/ ;
Series on 2018.

HTY. RAUL R. MONTINO
NOTARY PUBLIC
UNTIL DECEMBER 31, 2019
STR NO. 43734-13-2018
PD. 12/28/17/1000-CA
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Person Administering Oath