

CLIENT'S COPY

Republic of the Philippines  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
Manila

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

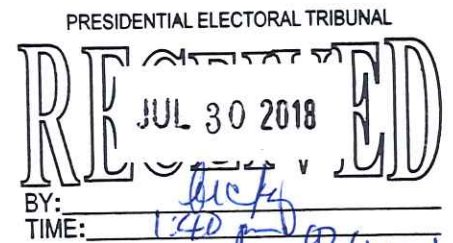
*Protestant,*

-versus-

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

*Protestee.*

X - - - - - X



**PET Case No. 005**

For: Election Protest for  
Vice-President

**COMPLIANCE**

[RE: PET RESOLUTION DATED 3 JULY 2018]

The undersigned counsel, **ATTY. GEORGE ERWIN M. GARCIA**, by himself, unto this Honorable Presidential Electoral Tribunal ("PET"), most respectfully alleges the following:

**1.** On **23 July 2018**, the undersigned counsel for the protestant received a copy of a *Resolution* issued by this Honorable Tribunal on **3 July 2018**, which directed him to **EXPLAIN** why he should not be cited in contempt of court for supposedly tolerating the BBM supporters to violate **A.M. No. 98-7-02-SC**, within ten (10) days from notice thereof.

**2.** With all due respect, there is no truth to the allegation that the undersigned counsel tolerated the BBM supporters to violate the guidelines set forth in **A.M. No. 98-7-02-SC**.

**3.** The activities of the BBM supporters in Padre Faura, Manila were never sanctioned by the undersigned counsel and his client, protestant Marcos.

**4.** As a matter of fact, protestant Marcos repeatedly requested his supporters to go back to their respective homes and

discontinue their activities in Padre Faura but they refused to heed his requests.

5. As for the undersigned counsel, it bears stressing that he has no influence much less control over the said BBM supporters. In fact, as mentioned above, even the protestant himself cannot restrain the activities of his supporters who were adamant in their position to proceed with the demonstration despite the repeated requests of protestant Marcos to stop the said activities.

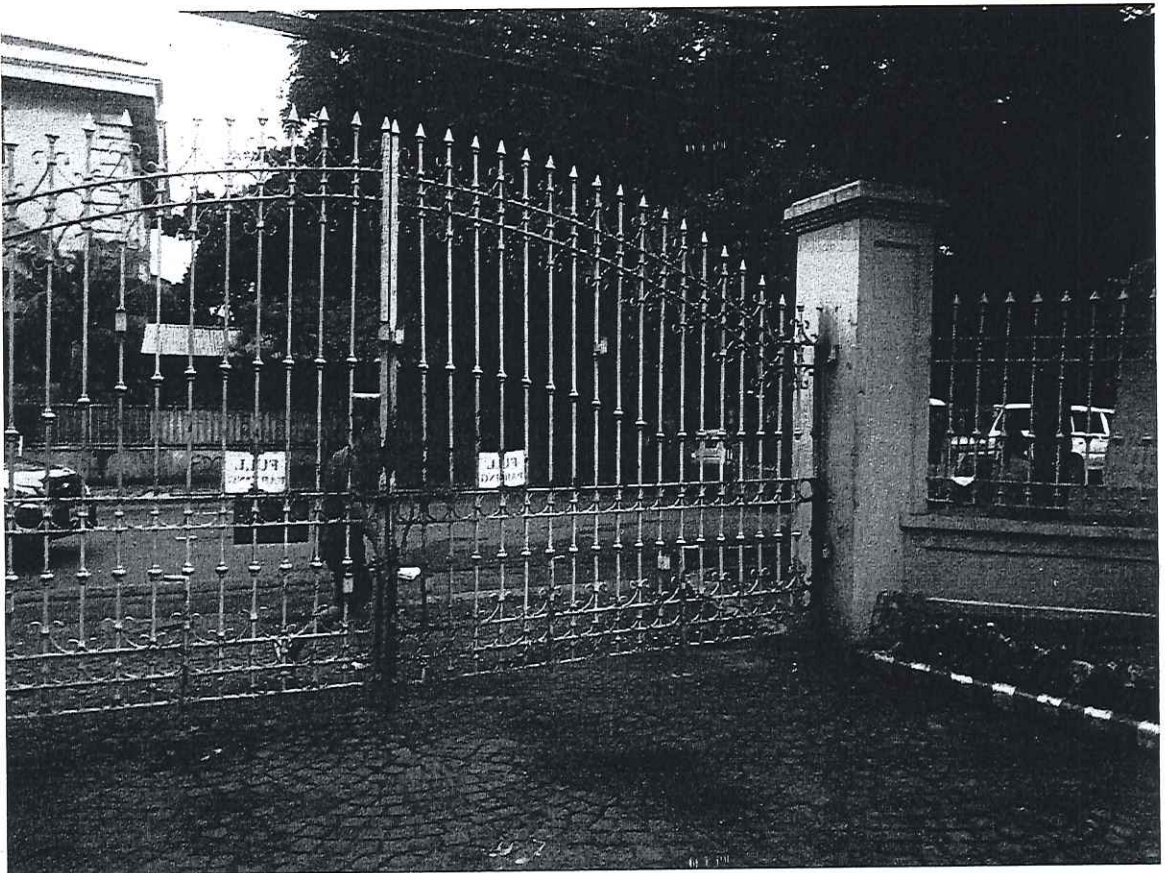
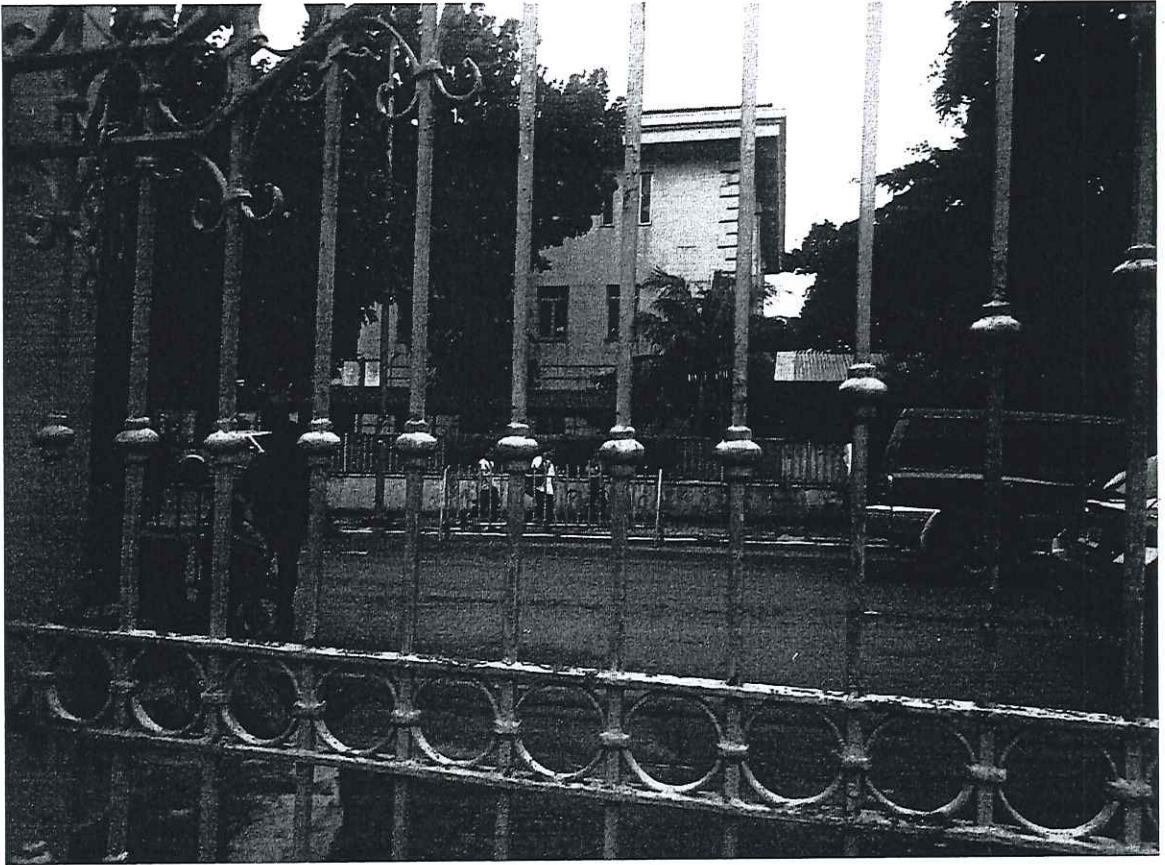
6. The undersigned counsel even informed Atty. Carina Cunanan, Vice-Chairman of the PET *Ad Hoc* Committee, of this dilemma during the meeting for the retrieval of the protested ballot boxes in the Province of Iloilo held last **15 May 2018**.

7. With all due respect, it is quite unfair for the undersigned counsel to be accused of tolerating the BBM supporters to violate **A.M. No. 98-7-02-SC** even though he repeatedly advised the staff of protestant Marcos to request the BBM supporters to stop their demonstration but to no avail.

8. Upon inquiry with the protestant's revisors, it would appear that the BBM supporters had already vacated the streets of Padre Faura since **23 June 2018**. To be sure, the undersigned counsel even requested some of the revisors for the protestant to take photos of Padre Faura as proof that the BBM supporters have terminated their rally, thus:











9. Furthermore, the undersigned counsel maintains that he did not tolerate the actions of the BBM supporters in violation of

**A.M. No. 98-7-02-SC**, hence, there is no factual or legal basis to cite him in contempt of court.

**10.** Finally, the undersigned counsel most respectfully manifests that he faithfully and consciously abides by his sworn duty under the Lawyer's Oath and shall forever respect, affirm and follow the rules and regulations set forth by the Supreme Court relative to the practice of law. He commits himself as one of its officers to always defend the Courts against those who are out to cause disrepute or disrupt its proceedings and/or those who intervene in the delivery of justice and observation of the rule of law.

### **PRAYER**

**ACCORDINGLY**, it is most respectfully prayed of this Honorable Tribunal to duly **NOTE** the foregoing *Compliance*.

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

City of Manila, Philippines, **25 July 2018**.

**G.E. GARCIA LAW OFFICE**  
*Lead Counsel for the Protestant*  
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By:



**GEORGE ERWIN M. GARCIA**  
Roll of Attorneys No. 44950  
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MCLE Compliance No. VI- 0006563; 02-19-18



*Copies furnished:*

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**COMMISSION ON ELECTIONS**

Law Department  
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Intramuros, Manila

# : WD90452823422

**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 *Compliance* 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 30, 2018, I served a copy of the following pleading/paper.

### **NATURE OF PLEADING/PAPER**

#### **"COMPLIANCE**

[RE: PET RESOLUTION DATED 3 JULY 2018]"

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:***

#### ***R. R. Nos.***

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

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**COMMISSION ON ELECTIONS**  
Law Department  
8/F, Palacio Del Gobernador  
Intramuros 1002 Manila

RD 90452823422

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 30, 2018, Manila, Philippines.

**JERRY C. GUEVARRA**  
*Affiant*

**SUBSCRIBED AND SWORN** to before me this JUL 30 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 582  
Page No. 17  
Book No. 8  
Series of 2018.

**ATTY. RAUL R. MONTINO**  
NOTARY PUBLIC  
UNTIL DECEMBER 31, 2019  
PTR NO. 6979843-2018  
PD.12/28/17 MANILA  
IBP LIFETIME NO. 012899  
SCROLL NO. 57289  
MCLE COMP. NO. V-0019704  
UNIT 2A 681 BEATERIO  
COR. MAGALLANES STS.  
INTRAMUROS, MANILA 1003

## 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 "**COMPLIANCE** [RE: PET RESOLUTION DATED 3 JULY 2018]" 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 30, 2018

**SUBSCRIBED AND SWORN** to before me this JUL 30 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

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MAYAPORES, MANILA 1002

Person Administering Oath