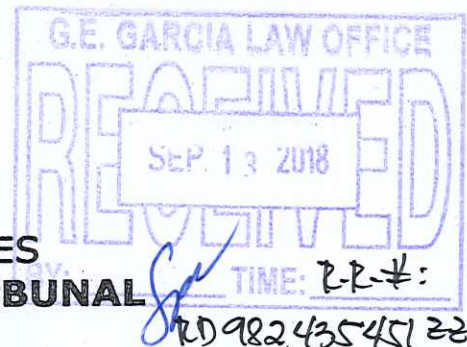


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



**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

**FOURTH MANIFESTATION OF GRAVE CONCERN WITH
URGENT MOTION FOR THE IMMEDIATE
INVESTIGATION OF THE LEAKED DATA FROM THE
PROVINCE OF CAMARINES SUR**

PROTESTEE MARIA LEONOR G. ROBREDO, by the undersigned counsel, to the Honorable Tribunal, respectfully states:

1. On 31 July 2018, the Committee on Electoral Reforms and People's Participation Joint with the Committee on Social Justice, Welfare and Rural Development; Finance; and Public Information and Mass Media ("Electoral Reforms") conducted a hearing.

2. Included in the Agenda of the Committee on Electoral Reforms was the Privilege Speech of Senate President Vicente C. Sotto III, delivered on March 6 and 14, 2018.

2.1. The privilege speech of Senate President Sotto raised four (4) issues pertaining to the 09 May 2016 National and Local Elections:

2.1.1. Early Transmissions;

2.1.2. Access of a foreign server into our election server;

2.1.3. Queuing servers; and

2.1.4. Untransmitted Election Returns.¹

2.2. With respect to the issue on the alleged early transmission, the resource person of Senate President Sotto was presented – Atty. Glenn Chong.

2.3. On this issue, Atty. Chong explained:

"MR. CHONG. The DNS works this way po. The PCOS or the VCM, hindi po niya alam kung kanino ipapadala iyong resulta. Hindi po niya alam kung kanino po ipapadala iyong resulta. So pupunta ho siya kay DNS server which is a domain name system server which acts as a directory assistance. Nagtatanong po siya, "Sino po ba ito si transmission code 1730?" Kasi hindi ho alam ni makina, ni VCM, kung kanino ipapadala iyong 1730. So si DNS ang magsasabi sa kanya, "Doon mo iyan ipapadala sa ganitong munisipyo. Munisipyo A, sa probinsya B." So that's the second step for the machine. What we are looking at is the DNS server log, the first part po. So ang question po ngayon, bakit may nagtatanong na po sa May 8 pa lang? Ang sagot po ng Comelec, "Final testing and sealing iyan." Kaya po gusto ko pong malaman if it is final answer nila, including Smartmatic because noticeably Smartmatic is very silent. Kasama po sila diyan. Because pinanindigan din nila na final testing and sealing po ito, then I will counter them

¹ Page 18, Transcript dated 31 July 2018, a copy of which is hereto attached as Annex "1" and made an integral part hereof.

with my next slide, sir."² [Emphasis and underscoring supplied.]

2.4. When asked where he was getting the data, Atty. Chong replied that it came from the Senate Electoral Tribunal:

"SEN. DRILON. Before that, Mr. Chair, may I know where the witness, Atty. Chong, is getting all of these data?

MR. CHONG. Sir, that's from the SET po.

SEN. DRILON. From the --?

MR. CHONG. Senate Electoral Tribunal because it was subpoenaed, sir.

SEN. DRILON. These are the records subpoenaed by the SET from the Comelec and submitted -

MR. CHONG. Yes, sir.

SEN. DRILON. So these are records from the SET?

MR. CHONG. Yes, sir. Public records na po iyan, sir.

SEN. DRILON. Thank you."³

2.5. Thereafter, Atty. Chong explained that *the transmission code "1730" refers to the Municipality of Ragay, Camarines Sur.*⁴

2.6. Further, to bolster his allegations, Atty. Chong presented copies of the audit logs from the

² Pages 34-35, Transcript dated 31 July 2018.

³ Page 36, Transcript dated 31 July 2018.

⁴ Page 37, Transcript dated 31 July 2018.

Municipality of Ragay, Camarines Sur as contained in his powerpoint presentation⁵.

2.7. Finally, when asked whether he was a counsel of protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity), Atty. Chong denied, while still under oath, that he never went to the PET or that he never represented protestant Marcos:

"SEN. DRILON. Well, I guess questions are raised here because you are known to be the counsel of Bongbong Marcos...

MR. CHONG. No, sir.

SEN. DRILON. ... and therefore your views here might be—

MR. CHONG. No, sir.

SEN. DRILON. What, what?

MR. CHONG. For the record, sir, I don't.

SEN. DRILON. Are you not the counsel of Bongbong Marcos?

MR. CHONG. No, sir.

SEN. DRILON. But you have represented Bongbong Marcos in the proceedings before the PET?

MR. CHONG. No, sir.

SEN. DRILON. Oh come on.

MR. CHONG. No, sir, honestly.

SEN. DRILON. I have here a letter of Atty. Garcia, counsel for Mr. Marcos who mentions

⁵ A copy of the PowerPoint Presentation of Atty. Glenn Chong is hereto attached as Annex "2" and made an integral part hereof.

you as one of the alternate representatives. This is a letter addressed to the Comelec on March 17, 2017.

MR. CHONG. Sir, they can review the logs there of the CCTV if they have found my soul there. Wala po ako doon, sir. My name was just there but I never went there.

SEN. DRILON. No here. I am looking at –

MR. CHONG. Yes, sir. I am not denying that. It may be there but I never went to the PET, not for any instance.

SEN. DRILON. No. But yes, I didn't say that you went to the SET, I am just saying that you were nominated as a representative of Bongbong Marcos.

MR. CHONG. I may have been nominated but then, I did not accept the nomination, sir."⁶ [Underscoring supplied.]

2.8. From this exchange, Senator Aquilino Pimentel III even warned Atty. Chong that *if he is found to be not accurate or misleading*, sanctions will be meted.⁷

2.9. Notwithstanding, Atty. Chong never retracted his statements regarding his connections to protestant Marcos.

3. Hence, this Motion.

The Province of Camarines Sur is not among the protested provinces before the Senate Electoral Tribunal.

⁶ Pages 47-48, Transcript dated 31 July 2018.

⁷ Page 49, Transcript dated 31 July 2018.

4. Contrary to the claims of Atty. Chong, the Province of Camarines Sur is not part of the Election Protest filed by Francis Tolentino before the Senate Electoral Tribunal ("SET").⁸

5. Neither were the audit logs from the Municipality of Ragay, Camarines Sur submitted by the Commission on Elections ("COMELEC") to SET.

6. In fact, based on the subpoena issued by SET, no data pertaining to the Municipality of Ragay, Camarines Sur was ever submitted by COMELEC.⁹

7. Noteworthy is that the Province of Camarines Sur was chosen as one (1) of pilot provinces of protestant Marcos.

8. It is for this reason that protestant Marcos even sought the decryption of the secure digital (SD) cards for Camarines Sur.

9. Further, it is for this reason that both protestant Marcos and protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) were able to secure the soft copies of the decrypted ballot images and audit logs from the sixty two (62) clustered precincts from the Municipality of Ragay, Camarines Sur.

10. Thus, if Atty. Chong were to be believed that he never represented protestant Marcos, where did he get the data from the Municipality of Ragay, Camarines Sur which he presented to the Senate Committee on Electoral Reforms?

⁸ A copy of the Amended Election Protest is hereto attached as Annex "3" and made an integral part hereof.

⁹ A copy of the CD submitted by COMELEC to SET is hereto attached as Annex "3-A" and made an integral part hereof.

**Atty. Glenn Chong who
never represented
protestant Marcos has
copies of the Resolutions
of the Honorable Tribunal
and pleadings submitted
by the parties.**

**Atty. Glenn Chong who
never represented
protestant Marcos was
present during the closure
activities of COMELEC
wherein only
representatives of the
parties were allowed to
observe.**

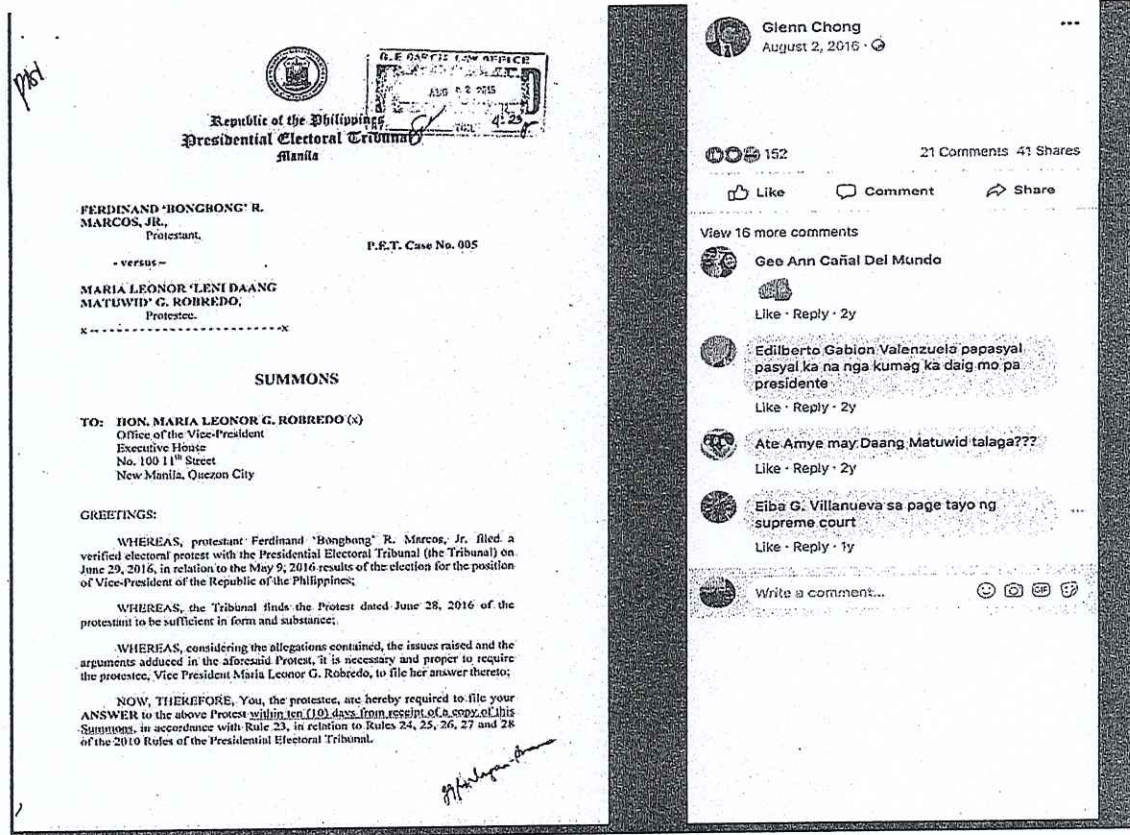
**Atty. Glenn Chong who
never represented
protestant Marcos was
present during the
Preliminary Conference.**

**Atty. Glenn Chong who
never represented
protestant Marcos was
among the witnesses in
the First Cause of Action.**

11. During the Senate Committee on Electoral Reforms hearing last 31 July 2018, Atty. Chong was steadfast in denying any connections to protestant Marcos.

12. However his personal facebook page will show the following disturbing facts:

12.1. On 02 August 2016, Atty. Chong posted a copy of the Summons issued by the Honorable Tribunal to protestee Robredo:¹⁰



12.2. Noteworthy is that Atty. Chong posted a copy of the Summons bearing a stamp mark from the lead counsel of protestant Marcos which bears the date of 02 August 2018.

12.3. In another facebook post on 03 October 2016, Atty. Chong even posted a copy of the first page of the Verified Answer with Special and Affirmative Defenses and Counter-Protest ("Verified Answer") filed by protestee Robredo.

12.4. This time, a copy of the first page of the Verified Answer contains a stamp mark from the Honorable Tribunal:¹¹

¹⁰ A copy of the screenshot of the 02 August 2016 post of Atty. Glenn Chong is hereto attached as Annex "4" and made an integral part hereof.

¹¹ A copy of the screenshot of the facebook post dated 03 October 2016 is hereto attached as Annex "5" and made an integral part hereof.

REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
MANILA

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

- versus -

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

**VERIFIED ANSWER WITH
SPECIAL AND AFFIRMATIVE DEFENSES AND
COUNTER-PROTEST**

PROTESTEE MARIA LEONOR G. ROBREDO, by the undersigned counsel, in compliance with the *Summons* dated 12 July 2016¹, submits her *Verified Answer with Special and Affirmative Defenses and Counter-Protest* to this Honorable Tribunal and respectfully states:

PREFATORY

*"The devil can cite Scripture for his purpose.
An evil soul producing holy witness
Is like a villain with a smiling cheek,
A goodly apple rotten at the heart.
O, what a goodly outside falsehood hath!"*
- Antonio in *"The Merchant of Venice,"*
William Shakespeare.

The prospect of defeat is a reality that all political candidates who stand for election must learn to accept—for as the late President Ferdinand E. Marcos was quoted to

Copy of which was received on 02 August 2016. Under the *Summons*, protestee Robredo is directed to file her Answer within a period of ten (10) days from 02 August 2016 or until 13 August 2016. However, the last day falls on a Saturday. Hence, this Answer is being filed on the next working day.

Glenn Chong
October 3, 2016 · 🌐

👤 837 234 Comments 495 Shares

👍 Like 💬 Comment ➦ Share

View previous comments 6 of 199

👤 Barrera Liezel Madalin na yan,, patalsikin na ang fake na v.p.pra matigil na ang pag embento nila ng kasinungalingan iyan lang ang magpapatigil s kanila,kasi mas ayaw nila si BBM.KYA NGA DINAYA SIYA..

Like · Reply · 1y

👤 Refuncion Avelina Sir president RRD, mag ingat ho kayo may ahas dyan sa katabi nyo, tinuklaw nyan sariling pinsan nya, how mach more kayo hinde nya tuklawi???? Ingat ingat pag may time.po.

👤 Jade Dolera Pag manunumpa na si #BBM.

Write a comment... 📷 📹 📺 📻

12.5. Subsequently, on 11 October 2016, Atty. Chong once more posted a copy of the Letter dated 27 September 2016 from COMELEC to then Chief Justice Maria Lourdes Sereno.¹²

12.6. Once more, this Letter contains a stamp mark from the Honorable Tribunal:

¹² A copy of the screenshot of the facebook post dated 11 October 2016 is hereto attached as Annex "6" and made an integral part hereof.

SOMETHING FISHY

REPUBLIC OF THE PHILIPPINES
COMMISSION ON ELECTIONS
MANILA

COPY

27 September 2016

HONORABLE MARIA LOURDES P.A. SERENO
Chief Justice
Supreme Court of the Philippines
Chairperson
Presidential Electoral Tribunal
Manila

Attestation: HONORABLE FELIPA B. ANAMA
Clerk of the Tribunal

Madame:

Please be advised that the Commission has approved the request of Smartmatic-IDA 2016, Inc. (SMIT) for the release of one thousand three hundred fifty-six (1,356) units of vote counting machines (VCMs) which were delivered to the Commission on Elections for contingency purposes during the last 69 May 2016 National, Local and ARMM Elections. It bears to emphasize that since these units were not actually deployed and/or used during said elections, the Commission considers the same as NOT within the scope of the Precautionary Protection Order issued by the Honorable Tribunal. Accordingly, the Commission intends to begin releasing the said VCMs on 26 October 2016.

In this regard, the Commission shall allow the parties and their representatives to observe the preparations for the release of these units, and hold a briefing at the Training Room, 2nd floor, Building 2, JAM Liner Warehouse, Barangay Pulong, Sta. Cruz, Sta. Rosa City, Laguna.

**SULAT NI COMELEC COMMISSIONER
CHRISTIAN ROBERTO LIM**

Isasauli na raw sa SMARTMATIC ang 1,356 vote counting machines na reserba umano sa halalan. Ayon sa COMELEC, dahil reserba lamang ito at hindi nagamit, hindi saklaw ng Precautionary Protection Order na ipinalabas ng PET.

Sa ilalim ng patakaran ng COMELEC, at least 1 reserbang makina ang ipinapadala sa bawat munisipyo sakaling may masira.

Hindi raw nagamit ang mga ito pero wala silang ipinakitang katunayan na hindi nga nagamit. At sa pagsauli nila ng mga makinang ito, ang mga kinatawan nila BBM at Robredo ay hanggang pag-obserba lamang. Hindi nila pina-pahintulutan na inspeksyunin ang mga makina upang matiyak na malinis at hindi nga ito nagamit. Mukhang nanloloko na naman ang sindikatong ito.

Glenn Chong
October 11, 2016 · 🌐

LAWAY LANG TALAGA ANG CAPITAL NG SINDIKATO

Sa sulat ng COMELEC sa PET sinabi nilang ang 1,356 reserbang vote counting machines na isasauli nila sa SMARTMATIC "were not actually deployed and/or used during said elections," kaya hindi saklaw ng Precautionary Protection Order (PPO) sa protesta ni BBM.

Sa aking karanasan sa COMELEC, magaling ang mga ito mag-interpret ng mga katagang ginagamit nila u... See More

👍 497
💬 108 Comments
🔗 294 Shares

👍 Like
💬 Comment
🔗 Share

View previous comments 3 of 68

Emilda Arciosa Dapat palitan na yang...

Write a comment...

12.7. Meanwhile, on 27 January 2017, Atty. Chong posted yet another copy of a pleading filed with the Honorable Tribunal on even date:¹³

as from Glenn Chong's post

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

FILE COPY

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

RE JAN 26 2017
FILED

EX-PARTE MOTION TO SET CASE FOR PRELIMINARY CONFERENCE

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.** ("protestant Marcos"), through the undersigned counsels, unto this Honorable Presidential Electoral Tribunal ("PET"), most respectfully moves to set the above-entitled case for preliminary conference pursuant to Rule 29 of A.M. No. 10-4-29-SC, otherwise known as the 2010 Rules of the Presidential Electoral Tribunal ("2010 PET Rules"), considering that the last pleading joining the issues in this election protest case had been filed and served as early as 2 September 2016.

However, this Motion is being filed without prejudice to the outcome of the pending incidents in this case.

Glenn Chong
January 27, 2017 · 🌐

FILE COPY

👍 22
🔗 8 Shares

👍 Like
💬 Comment
🔗 Share


Write a comment...

Badion de Vera
Yasser Lumbos is a mutual friend.
👤 Confirm Friend

¹³ A copy of the screenshot of the facebook post dated 27 January 2017 is hereto attached as Annex "7" and made an integral part hereof.

10

12.8. Continuing with this disturbing pattern, Atty. Chong posted a Resolution issued by the Honorable Tribunal which was received by protestant Marcos on 10 April 2017:¹⁴



Republic of the Philippines
Presidential Electoral Tribunal
Manila

NOTICE

Sirs/Mesdames:

Please take notice that the Tribunal issued a Resolution dated MARCH 21, 2017, which reads as follows:

"PET Case No. 005 – FERDINAND 'BONGBONG' R. MARCOS, JR., protestant, versus MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO, protestee."

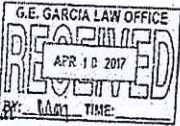
RESOLUTION


Rule 33 (b) of the Tribunal's 2010 Rules provides that the cash deposit for the protest and counter-protest, if they require the bringing of the contested ballot boxes and election documents to the Tribunal, is "P500.00 for each precinct involved".

In his protest, Protestant assails the election results in 39,221 clustered precincts – 36,465 of which he prays for the conduct of manual count and judicial revision, while the remaining 2,756 he prays for the annulment of election results. Based on the Commission on Elections (COMELEC) data, the 39,221 clustered precincts are composed of 132,446 precincts. On the other hand, Protestee, as Counter-Protestant, assails the election results in 8,042 clustered precincts, which are composed of 31,278 precincts, also based on COMELEC data. The protest and counter-protest require the bringing of ballot boxes and other election paraphernalia to the Tribunal for all the foregoing precincts.

Based on the foregoing, the cash deposit for Protestant is P500.00 for each of the 132,446 precincts, which amounts to P66,223,000.00. For the Counter-Protestant, the cash deposit is P500.00 for each of the 31,278 precincts, which totals P15,639,000.00. Deducting the initial deposit of P200,000.00 paid by each, the cash deposits due from Protestant and Counter-Protestant are as follows:

a. For Protestant: P66,023,000.00; and






Glenn Chong
April 11, 2017 · 🌐

102 27 Comments 18 Shares

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View 9 more comments



Boy Paulino WE CAN DONATE P500 FOR EACH BALLOT BOX


Like · Reply · 1y

↳ Mordeno Alice replied · 1 Reply




Oirsaro Odaglee Finally! thanks be to God.

Like · Reply · 1y




Lex Roman Daang patuwad.

Like · Reply · 1y




Ian Chito Sarte
<https://www.facebook.com/jjojo.saniel.1>
TROLL po ito mag ingat LENi supporter

Like · Reply · 1y



Judith Moreno Maramisilanggimmick

Like · Reply · 1y



Reynante Villanueva BBM DAHIL NOON AT NGAYUN MARCOS PARIN

Like · Reply · 1y

Write a comment...

12.9. On 20 April 2017, protestant Marcos filed an Omnibus Motion i. To Dismiss the Counter-Protest and ii. To Reiterate the Immediate Setting of the Preliminary Conference dated 19 April 2017.

12.10. Immediately thereafter or on 21 April 2017, Atty. Chong posted yet a copy of the said Omnibus Motion in his facebook page:¹⁵

¹⁴ A copy of the screenshot of the facebook post dated 11 April 2017 is hereto attached as **Annex "8"** and made an integral part hereof.

¹⁵ A copy of the screenshot of the facebook post dated 21 April 2017 is hereto attached as **Annex "9"** and made an integral part hereof.

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

OMNIBUS MOTION

I. TO DISMISS THE COUNTER-PROTEST and
II. TO REITERATE THE IMMEDIATE SETTING
OF THE PRELIMINARY CONFERENCE

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

- On 21 March 2017, a Resolution was issued by this Honorable Tribunal directing protestant Marcos to pay Sixty Six Million Two Hundred Twenty Three Thousand Pesos (Php66,223,000.00) and the protestee/counter-protestant to pay Fifteen Million Six Hundred Thirty Nine Thousand Pesos (Php15,639,000.00) as their respective cash deposits for the protest and counter-protest in this case.
- The payment for the cash deposit is divided in two tranches: the first installment to be paid on or before 14 April 2017 and the final installment to be paid on or before 14 July 2017.
- However, since 14 April 2017 is a non-working holiday, both parties are given until the next succeeding business day— 17




Glenn Chong
April 21, 2017 · 🌐

👍👍👍 63
10 Shares

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💬 Comment
➦ Share

Write a comment...

Suggested Groups See All



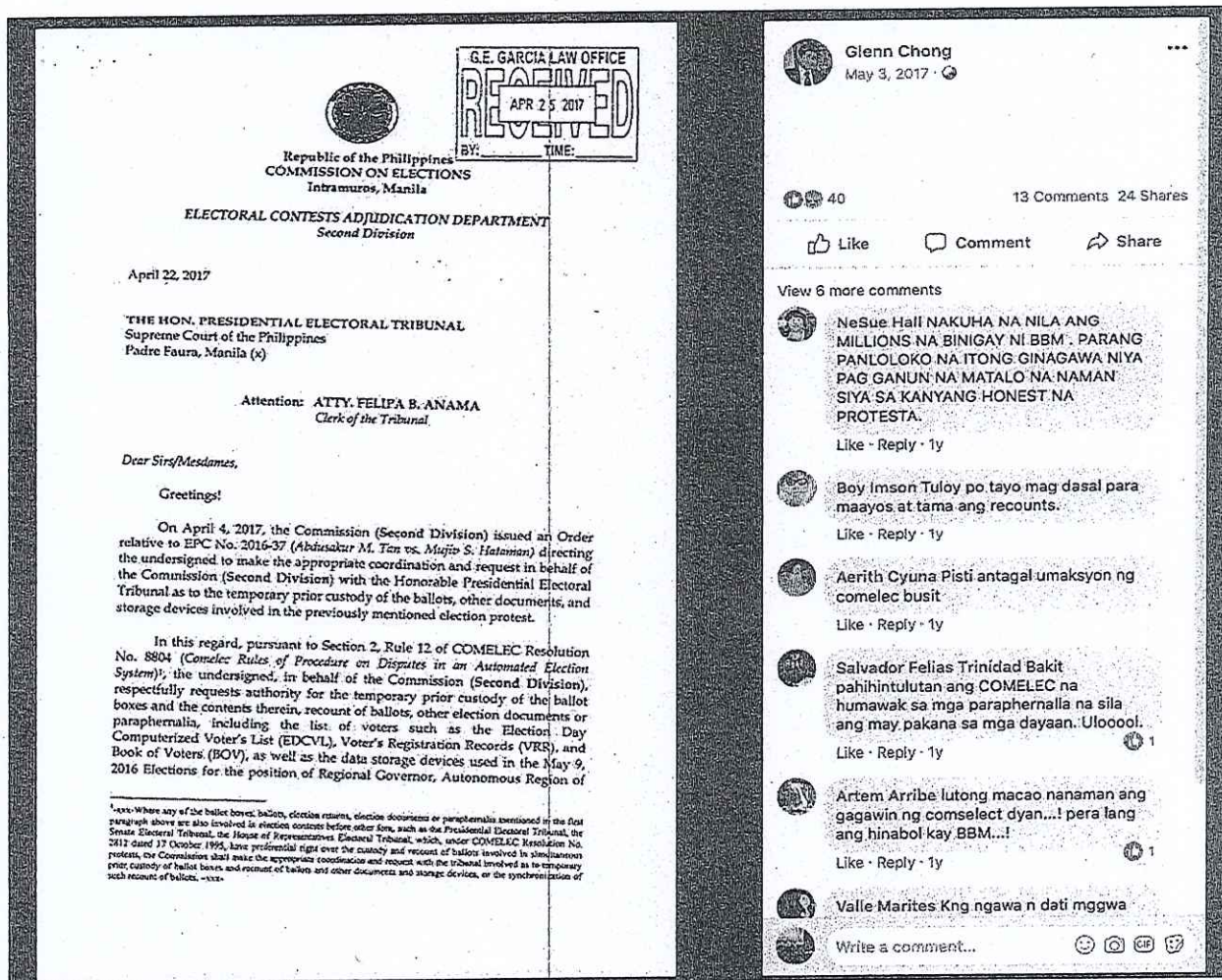
Philippine Airlines

Cebu Pacific, Philippine Airlines Promo
Update and...
33,919 members

+ Join

12.11. In another facebook post, Atty. Chong posted a copy of the Letter from then Clerk of the Tribunal, Atty. Felipa B. Anama on 03 May 2017:¹⁶

¹⁶ A copy of the screenshot of the facebook post dated 03 May 2017 is hereto attached as Annex "10" and made an integral part hereof.



12.12. The said letter bears the stamp mark of the lead counsel of protestant Marcos.

12.13. In his 14 May 2017 facebook post, Atty. Chong posted a copy of the Urgent Ex-Parte Motion to Designate Hearing Commissioners filed by protestant Marcos on 12 May 2017:¹⁷

¹⁷ A copy of the screenshot of the facebook post dated 14 May 2017 is hereto attached as Annex "11" and made an integral part hereof.

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

**MANIFESTATION WITH OMNIBUS MOTION
(1) FOR CLARIFICATION; AND (2) TO BE FURNISHED
COPY OF THE ANNEXES ATTACHED TO THE
MANIFESTATION/COMPLIANCE DATED 25 MAY 2017**

PROTESTEE **MARIA LEONOR G. ROBREDO**, by the undersigned counsel, to the Honorable Tribunal, respectfully states:

1. On 07 April 2017, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) filed a Manifestation seeking clarification on the following matters:

1.1. At the onset, protestee Robredo would like to be clarified as to why these things, i.e., the expiration of the certificates in the USB tokens are happening?

1.2. How much is being spent by the Commission on Elections on the rent of the warehouse in Sta. Rosa, Laguna which is still being used for purposes of the closure activities.

1

Glenn Chong
July 3, 2017 · 🌐

Send this to friends or post it on your timeline.

TAKOT TALAGA SI ROBREDO SA MANUAL RECOUNT NG MGA BALOTA


Ayon kay Robredo, hindi siya takot sa protesta ni BBM dahil siya raw ang totoong nanalo bilang pangalawang pangulo. Pero habang palapit ng palapit na ang araw ng manual recount ng mga balota, panay naman ang kanyang pagfile ng mga dilatory motions o mga motions na walang saysay at ang pakay lamang ay maantala ng husto ang protesta.

Tulad ha... See More


👍👍👍 1.4K 411 Comments · 1.2K Shares

👍 Like 💬 Comment ➦ Share


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 Joan Cunanan mga kkampi ksi nia sanay dn s dayaan kaya gnun dn s lenie 🙏
but God is good dman mahawakan n bongbong ang vp ok lng un atleast d sya ng daya mas ok un kay Lord 🙏 God is good God bless bongbong para saamin ikw ang tunay n panalo no matter what happen 🙏

Like · Reply · 1y

 Dereck Uy Mmtay kna sana puta ka

Like · Reply · 1y

 Josephine Balibago Fake recount. Kung wla kang tinatago

Like · Reply · 50w

12.17. On 30 October 2017, Atty. Chong posted a copy of a Letter dated 10 July 2017 from the Office for Overseas Voting to then Clerk of the Tribunal, Atty. Felipa B. Anama.

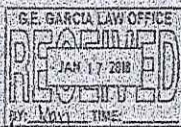
12.18. This facebook post bears the stamp mark of the Honorable Tribunal:¹⁹


¹⁹ A copy of the screenshot of the facebook post dated 30 October 2017 is hereto attached as Annex "13" and made an integral part hereof.

12.23. This time, on 12 December 2017, Atty. Chong posted a copy of the Partial Motion for Reconsideration filed by protestant Marcos:²²

12.24. While consistently denying any relation to protestant Marcos, Atty. Chong on 19 January 2018 posted a copy of the Resolution of the Honorable Tribunal dated 10 January 2018.

²² A copy of the screenshot of the facebook post dated 12 December 2017 is hereto attached as Annex "16" and made an integral part hereof.




 Republic of the Philippines
Presidential Electoral Tribunal
 Manila

NOTICE

Sirs/Mesdames:

Please take notice that the Tribunal issued a Resolution dated JANUARY 10, 2018, which reads as follows:

"PET Case No. 005- FERDINAND "BONGBONG" R. MARCOS, JR., protestant, versus MARIA LEONOR "LENI DAANG MATUWID" G. ROBREDO, protestee."

Acting on the Motion to Turnover to the Protestant the Official, Printed and Authenticated Copies of the Decrypted Ballot Images, Election Returns and Audit Logs dated November 17, 2017 filed by the counsel for protestant Ferdinand "Bongbong" R. Marcos, Jr. praying for this Tribunal to direct the Commission on Elections' Election Records and Statistics Department (COMELEC-ERSD) to turn over to the protestant all the official, printed and authenticated copies of the decrypted ballot images, election returns and audit logs for all the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental, the Tribunal Resolved to **ALLOW** protestant to secure photocopies or soft copies of the decrypted ballot images, election returns and other reports for all the protested clustered precincts of the pilot provinces, subject to the payment of incidental costs. However, the custody of the official, printed and authenticated copies of the decrypted ballot images, election returns and audit logs from the protested clustered precincts of the said pilot provinces should remain with the Tribunal for the conduct of the revision proceedings pursuant to the 2010 PET Rules.

The Tribunal further Resolved to:

a. **DENY** the Partial Motion for Reconsideration (of the resolution dated November 7, 2017) dated December 4, 2017 filed by counsel for the protestant Ferdinand "Bongbong" R. Marcos, Jr. praying for the Tribunal to grant the partial reconsideration, reverse and reconsider the directive in resolution dated November 7, 2017 which granted protestee's Urgent Ex-Parte Motion to be Allowed to Secure Soft Copies of the Ballot Images and Other Reports from the Decrypted Secured Digital Cards dated October 23, 2017 relative to the ongoing

Glenn Chong
January 19 · 🌐

MAKATARUNGAN BA ANG GINAGAWA NI JUSTICE CAGUIOA?


Nagpalabas ng panibagong resolution ang PET kung saan pinayagang makakuha ang kampo ni BBM ng softcopies o photocopies ng mga decrypted ballot images (larawan ng mga balota), election returns (resulta ng halalan), at audit logs (detalyadong record ng vote counting machine) sa lahat ng protested precincts mula sa Camarines Sur, Iloilo at Negro Orien... See More

👍 1.2K 692 Comments 1.2K Shares

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Sergs Platino



👍 Like · Reply · 28w

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12.25. The copy of the Resolution was received by lead counsel of protestant Marcos on 17 January 2018 as evidenced by the stamp mark.²³

12.26. A day after protestee Robredo received a copy of the Letter dated 07 February 2018 from the lead counsel of protestant Marcos or on 08 February 2018, Atty. Chong posted a copy in his facebook page:²⁴

²³ A copy of the screenshot of the facebook post dated 19 January 2018 is hereto attached as **Annex "17"** and made an integral part hereof.

²⁴ A copy of the screenshot of the facebook post dated 08 February 2018 is hereto attached as **Annex "18"** and made an integral part hereof.



G.E. GARCIA LAW OFFICE

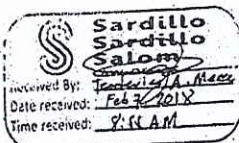
Ground Floor, Laka Building
372 Cabanatuan St., Intramuros, Manila 1002
Tel./fax: (02) 577-7261
E-mail: georgemarcos_garcia@yahoo.com

George Edwin M. Garcia
Attorney-at-Law

7 February 2018

ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee Maria Leonor G. Robredo
Sardillo Sardillo Salom Law Office
Unit 802, Talpan Place
F. Ortigas Avenue
Ortigas Center, Pasig City



Dear Atty. Macalintal:

Please see attached draft of the Joint Manifestation to formalize the commitment of my client, Ferdinand "Bongbong" R. Marcos, that he is hereby withdrawing any and all motions and incidents that may unduly delay and hamper the revision proceedings before the Honorable Presidential Electoral Tribunal (PET).

We trust that you and your client, protestee Maria Leonor G. Robredo, will faithfully comply with your undertaking to sign this Joint Manifestation to reinforce your assurance that any and all pending motions and incidents that may unjustifiably prolong, impede and/or interrupt the revision proceedings before the Presidential Electoral Tribunal shall be likewise withdrawn by your camp.

Furthermore, we expect that both the protestant and protestee shall remain staunchly committed in their guarantee that shall refrain from filing frivolous motions that will unwarrantedly defer, protract and/or suspend the revision proceedings in this election protest.

Thank you.

Very truly yours,

GEORGE EDWIN M. GARCIA
Lead Counsel for Protestant Ferdinand "Bongbong" R. Marcos

Scanned by CamScanner



Glenn Chong

February 8 · 🌐

MARCOS IS NOT BLUFFING, ROBREDO IS IN BAD FAITH

Ipinapalabas ng kampo ni Robredo na hindi seryoso si BBM sa kanyang hamon na bawiin ng magkabilang panig ang kani-kanilang mga nakabinbing mga motions sa PET upang mapabilis ang protesta dahil mali diumano ang dokumentong pinapipirmahan ng kampo ni BBM sa kampo ni Robredo. Hindi rin daw sumipot ang kampo ni BBM sa pizza restaurant na pinili ng kampo... See More

👍👍👍 1.9K

380 Comments 1.8K Shares



Like



Comment



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Aris Medrano Bong bong true vp

Like · Reply · 25w



Haide Ocbina Flores BBM is real in good faith because he is in the right track...while Rob-reddo is obviously doing the magic tricks on how to escape from reality...mandaraya kasi... Praying for Justice for BBM...!!!

Like · Reply · 25w



Joy Justinquintos Bestado na kc mga Dilawan mga manloloko

Like · Reply · 25w

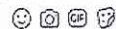


Vicky Magsingit Furuc

Happy



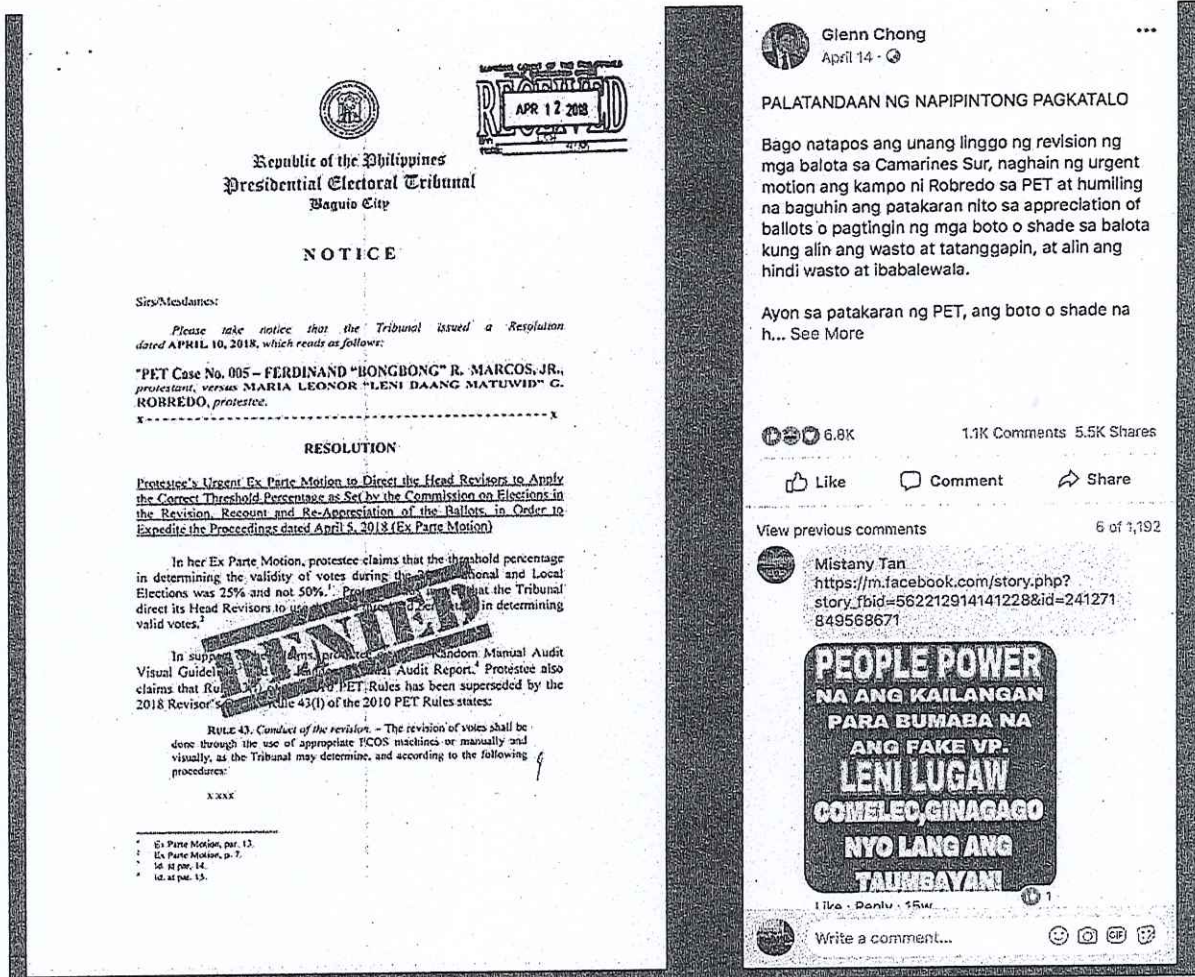
Write a comment...



12.27. On 14 April 2018, Atty. Chong posted a copy of the Resolution dated 10 April 2018 issued by the Honorable Tribunal.

12.28. This time, the copy of the Resolution bears the stamp mark of the Public Information Office of the Supreme Court of the Philippines:²⁵

²⁵ A copy of the screenshot of the facebook post dated 14 April 2018 is hereto attached as Annex "19" and made an integral part hereof.



12.29. The records of the Honorable Tribunal will show that on 19 April 2018, protestee Robredo filed an Urgent Motion for Reconsideration (of the Resolution dated 10 April 2018) With Reiterative Prayer to Immediately Direct the Head Revisors to Use the Twenty Five (25%) Threshold Percentage in the Revision, Recount and Re-Appreciation of Ballots.

12.30. A copy of the said Motion was sent to protestant Marcos by registered mail.

12.31. However, on the next day or on 20 April 2018, Atty. Chong posted a portion of the said Motion in his facebook account:²⁶

²⁶ A copy of the screenshot of the facebook post dated 20 April 2018 is hereto attached as Annex "20" and made an integral part hereof.

Bigyan ni'yo kami ng patas na laban!

21. To illustrate, based on the Election Returns, in Municipality of Balatan, Barangay Laganac, Cluster Precinct No. 167, the parties received the following votes:

Robredo	358
Marcos	17

22. However, due to the application of the fifty percent (50%) threshold percentage, the physical count of ballots yielded the following results:

Robredo	346
Marcos	17

23. Or, in simple terms, the votes for protestee Robredo was decreased by twelve (12) votes while the votes for protestant Ferdinand R. Marcos, Jr. (hereinafter "Marcos" for brevity) was maintained.

Page 6 ng Urgent Motion for Reconsideration ni Robredo Pinapatunayan nito na:

- Hindi apektado si BBM sa anumang vote shading threshold ang ipapatupad ng PET.
- Si Robredo ang apektado dahil marami siyang boto na maliliit, pandak, duwende o Yoda.
- Sinungaling talaga si Mac.

Ang laban na ito ay nagsimula noong araw ng botohan at ang protesta ay karugtong lamang ng laban na iyon.

Lumamang si Robredo dahil ang Comelec at Smartmatic ay pumanig sa kanya. Bago pa man magsimula ang botohan hanggang sa kasagsagan ng bilangan; ilang anomaliya ang nangyari kung saan naubos ang halos 1 milyong boto na lamang ni BBM at unti-unting tumaas ang lamang ni Robredo.

Sa protesta naman, patuloy ang lamang ni Robredo dahil basa na ang mga balota sa 29 ballot boxes (tataas pa ang bilang nito sa mga susunod na update), 73 ballot boxes ang nawawalan ng voter receipts, at may mga balota sa 1 ballot box ang may bahid ng pagkasunog gamit ang sigarilyo.

Patas ba ang laban na kayo lang ang nakakalamang?

Glenn Chong
April 20 · 🌐

HINDI SI ROBREDO ANG BIKTIMA SA ISANG HINDI PATAS NA LABAN

Sa kanyang paghain ng Urgent Motion for Reconsideration sa PET dahil gusto niyang ipilit na bilangan ang kanyang mga boto na hindi pumasa sa 50% vote shading threshold, ipinalabas ni Robredo na siya ang dehado at biktima sa isang hindi patas na laban.

... See More

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Egay Bautista Rebamontan Poi Ruiz
Like · Reply · 7w

Write a comment... 😊 📷 📺 📹

12.32. On 23 April 2018, protestee Robredo filed her Compliance (of the Resolution dated 10 April 2018) with the Honorable Tribunal.

12.33. Once more, a copy of the said Compliance was sent to protestant Marcos by registered mail.

12.34. Surprisingly, after the lapse of a mere five (5) days or on 28 April 2018, Atty. Chong posted a copy of the said Compliance in his facebook account.

12.35. This time, a copy of the said Compliance bears the stamp mark of the Honorable Tribunal:²⁷

²⁷ A copy of the screenshot of the facebook post dated 28 April 2018 is hereto attached as Annex "21" and made an integral part hereof.

Glenn Chong
May 21 · 🌐

MUNICIPAL TREASURERS NG CAMSUR PINAGPALIWANAG NA NG PET DAHIL SA BASA AT SIRANG MGA BALOTA

Pinagpaliwanag ngayon ng PET ang ilang municipal treasurers ng Camarines Sur kung bakit may mga basa at sirang balota sa loob ng ballot boxes habang ang mga ito ay nasa kanilang custody o pangangalaga.

Pinagpaliwanag ng PET ang mga municipal treasurers ng Bato, Sagñay, Garchitorea at Ocampo sa loob ng 10 ... See More

👍👍👍 2.9K 663 Comments 2.9K Shares

👍 Like 💬 Comment ➦ Share

View previous comments 6 of 548

Frederick V. Silao All yellows, firing squad, bullshit lahat yan, manloloko, sinungaling
Like · Reply · 10w

Lopio Emeterio bigti kana kc bistado kana ng taong bayan.
Like · Reply · 10w

Rex Mamauag Magpakamatay ka na lang lening lugaw
Like · Reply · 10w

Rex Mamauag

Write a comment... 🗨️ 📷 📺 🎵

12.38. Meanwhile, as the pending issue on the correct threshold, protestant Marcos filed his Comment/Opposition to the Urgent Motion for Reconsideration (of the Resolution dated 10 April 2018) With Reiterative Prayer to Immediately Direct the Head Revisors to Use the Twenty Five (25%) Threshold Percentage in the Revision, Recount and Re-Appreciation of Ballots.

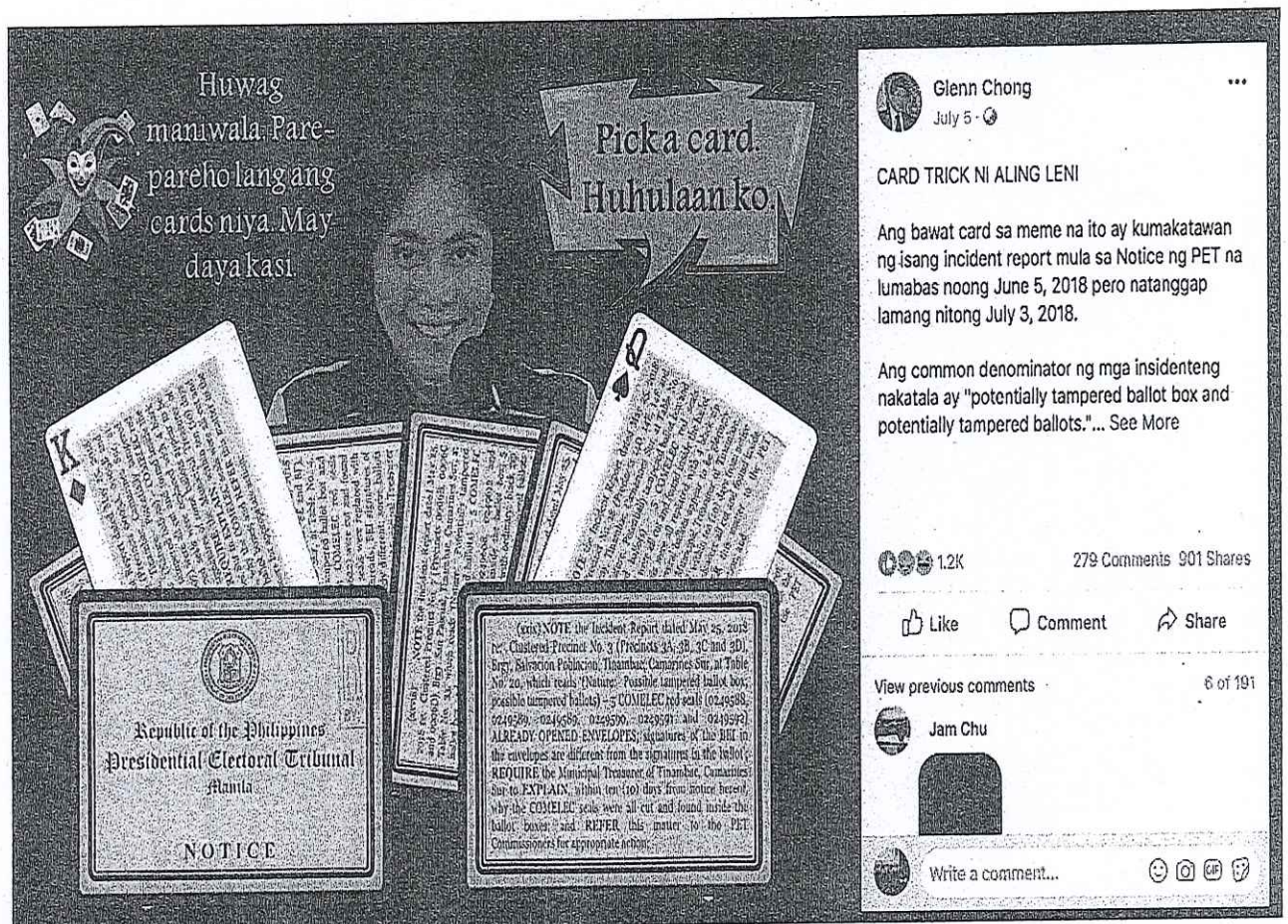
12.39. Not surprising, the front page of the said Comment/Opposition was posted by Atty. Chong in his facebook page on 29 May 2018.²⁹

12.40. On 05 July 2018, Atty. Chong even specified that it was only on 03 July 2018 that a

²⁹ A copy of the screenshot of the facebook post dated 29 May 2018 is hereto attached as Annex "23" and made an integral part hereof.

copy of the Resolution dated 05 June 2018 was received.

12.41. Not content, Atty. Chong even posted portions of the said Resolution in his facebook account:³⁰

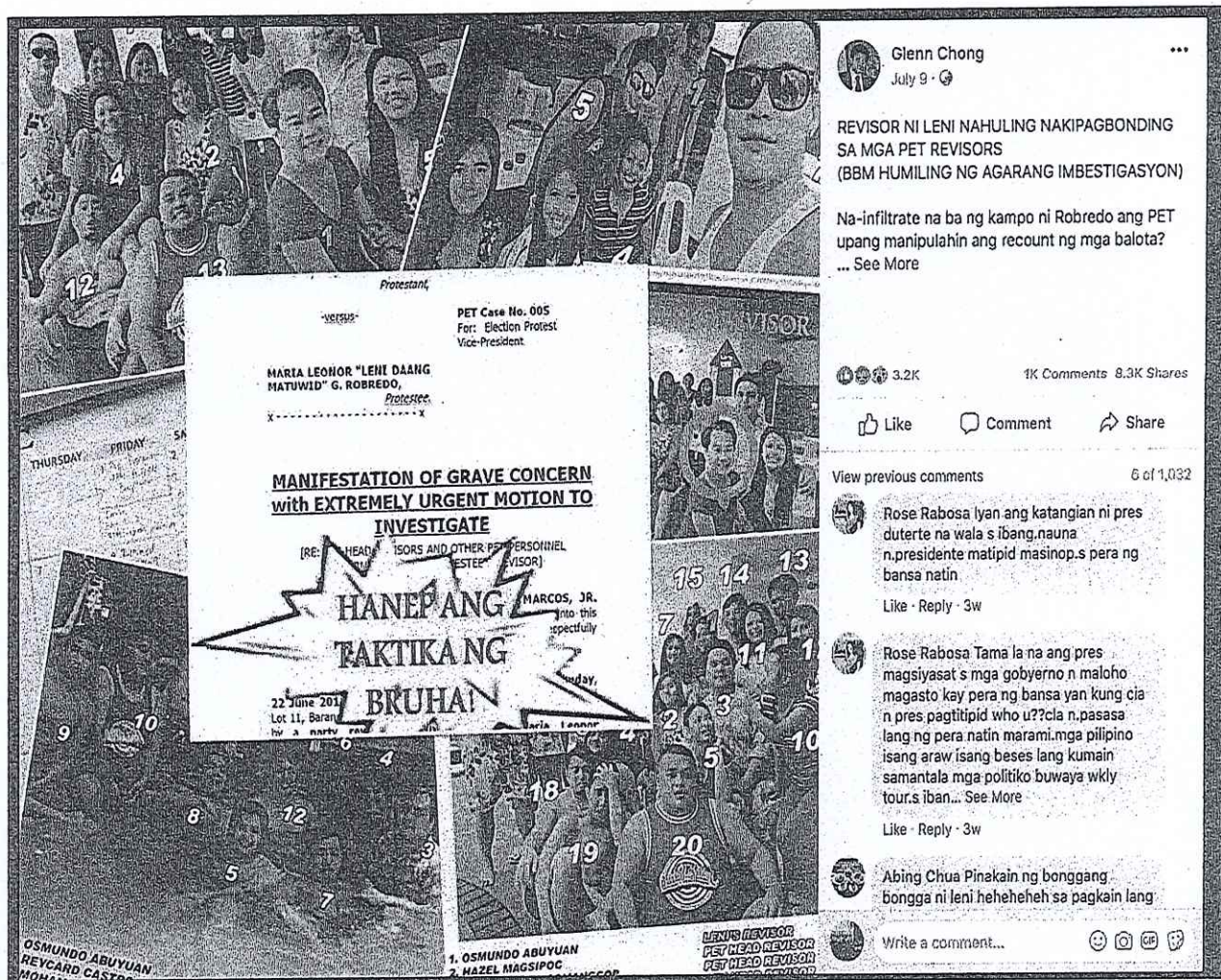


12.42. Meanwhile, on 09 July 2018, protestant Marcos filed a Manifestation of Grave Concern with Extremely Urgent Motion to Investigate.

12.43. On even date, Atty. Chong managed to post portions of the said Manifestation in his facebook account:³¹

³⁰ A copy of the screenshot of the facebook post dated 05 July 2018 is hereto attached as Annex "24" and made an integral part hereof.

³¹ A copy of the screenshot of the facebook post dated 09 July 2018 is hereto attached as Annex "25" and made an integral part hereof.



13. Despite his consistent denials, Atty. Chong has managed to secure copies of the pleadings and Resolutions of the Honorable Tribunal meant for protestant Marcos.

14. In some instances, Atty. Chong even managed to secure copies of documents with the stamp mark of the Honorable Tribunal and the Supreme Court.

15. Atty. Chong is not a party to this Election Protest.

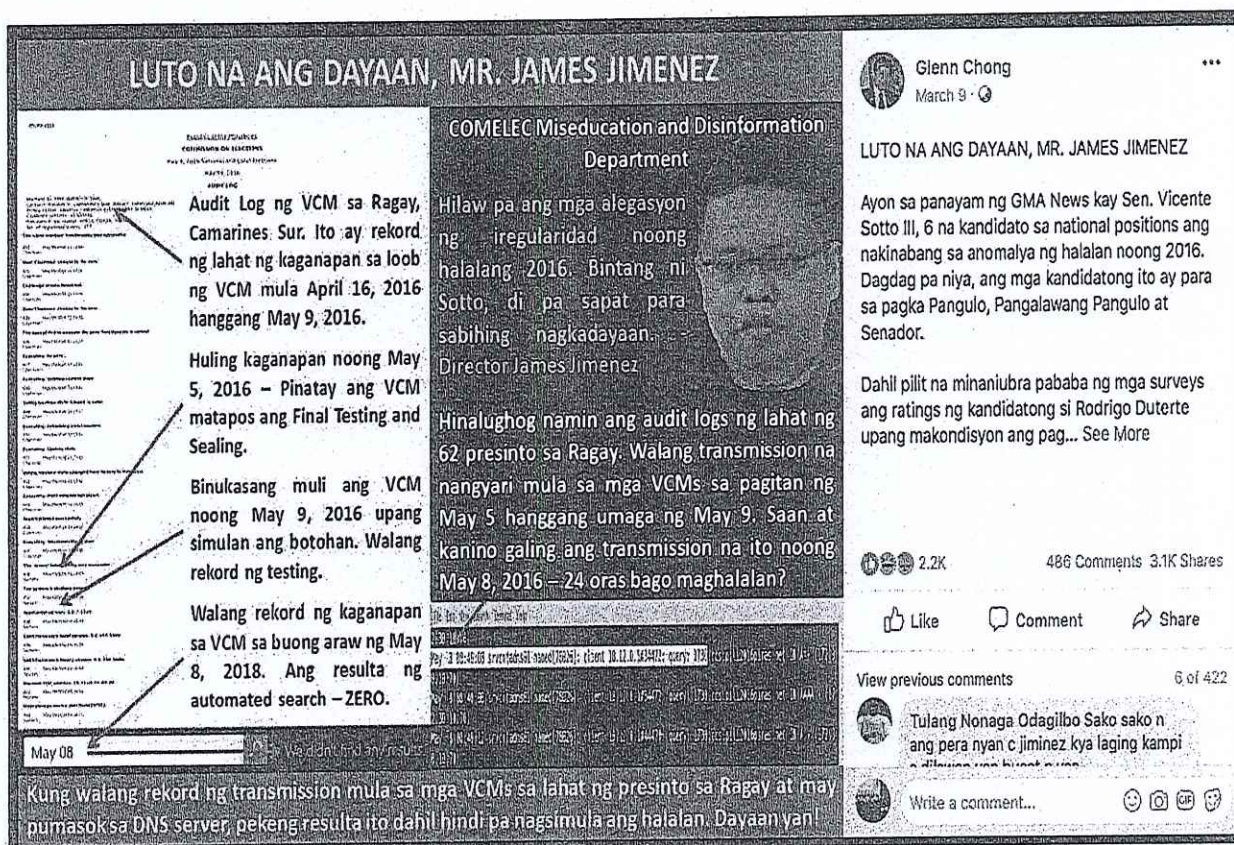
16. Meanwhile, by his own denials, Atty. Chong is not and has never been a counsel for protestant Marcos.

17. And, if Atty. Chong were to be believed, he never at any point, represented protestant Marcos.

18. Thus, how was Atty. Chong able to secure copies of the pleadings and Resolutions of the Honorable Tribunal.

19. Worse, Atty. Chong has been able to secure copies of the Audit Logs from the Municipality of Ragay, Camarines Sur.

20. On 09 March 2018, Atty. Chong posted in his facebook page a portion of an Audit Log from the Municipality of Ragay, Camarines Sur:³²



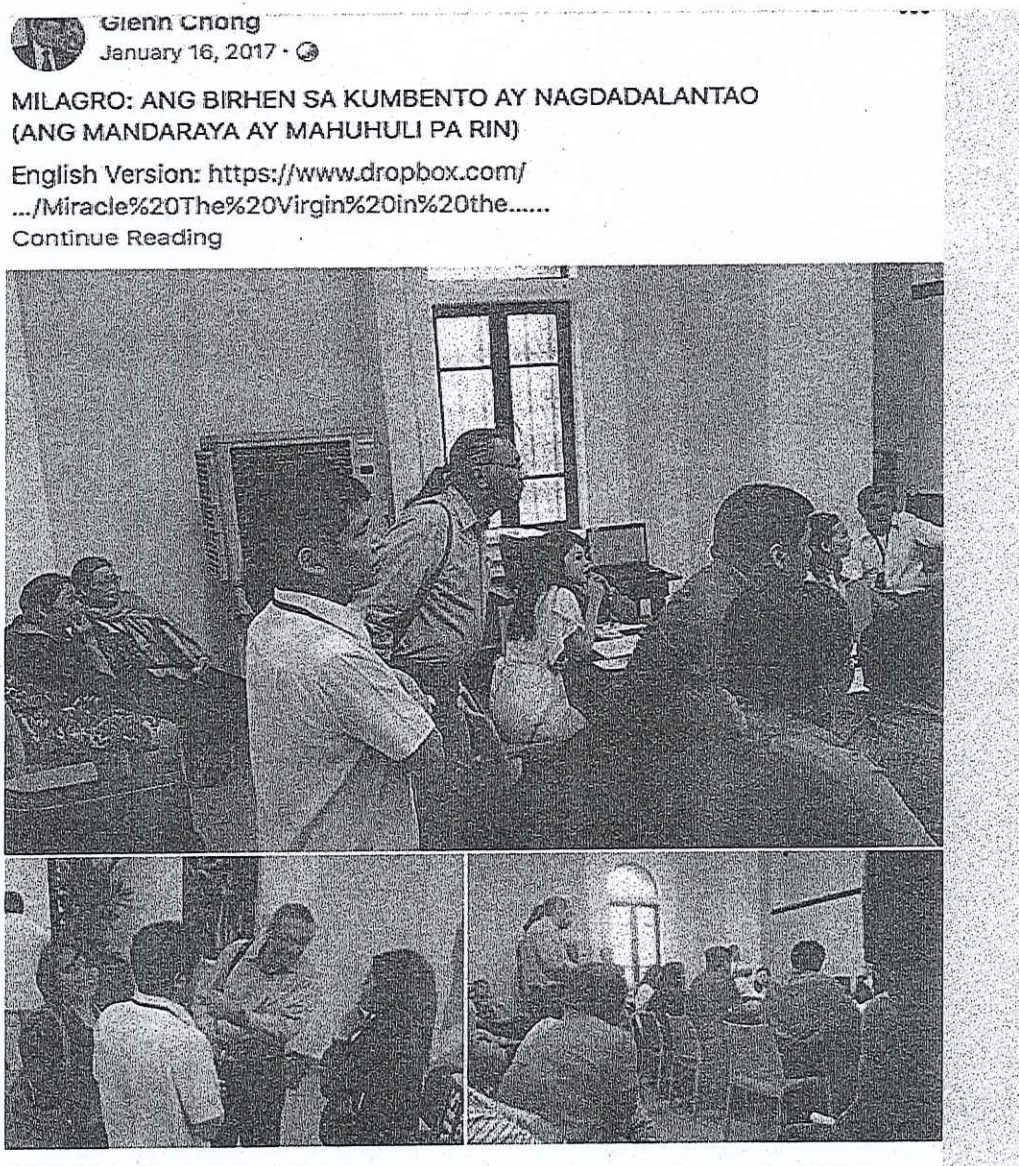
21. These audit logs were also presented by Atty. Chong to the Senate Committee on Electoral Reforms during the hearing last 31 July 2018.

22. Likewise, Atty. Chong has consistently denied having been a representative of protestant Marcos.

23. However, on two (2) separate occasions, during the closure activities wherein the Honorable Tribunal

³² A copy of the screenshot of the facebook post dated 09 March 2018 is hereto attached as Annex "26" and made an integral part hereof.

directed COMELEC to allow representatives of the parties to observe, Atty. Chong was present:³³



24. In one of the photos that Atty. Chong posted, he can be seen talking to one of the lawyers of protestant Marcos.

25. During the turnover of the Vote Counting Machines (VCMs) in Sta. Rosa, Laguna, Atty. Chong was not only present but he also gave interviews to the media:³⁴

³³ A copy of the screenshot of the facebook post dated 16 January 2017 is hereto attached as **Annex "27"** and made an integral part hereof.

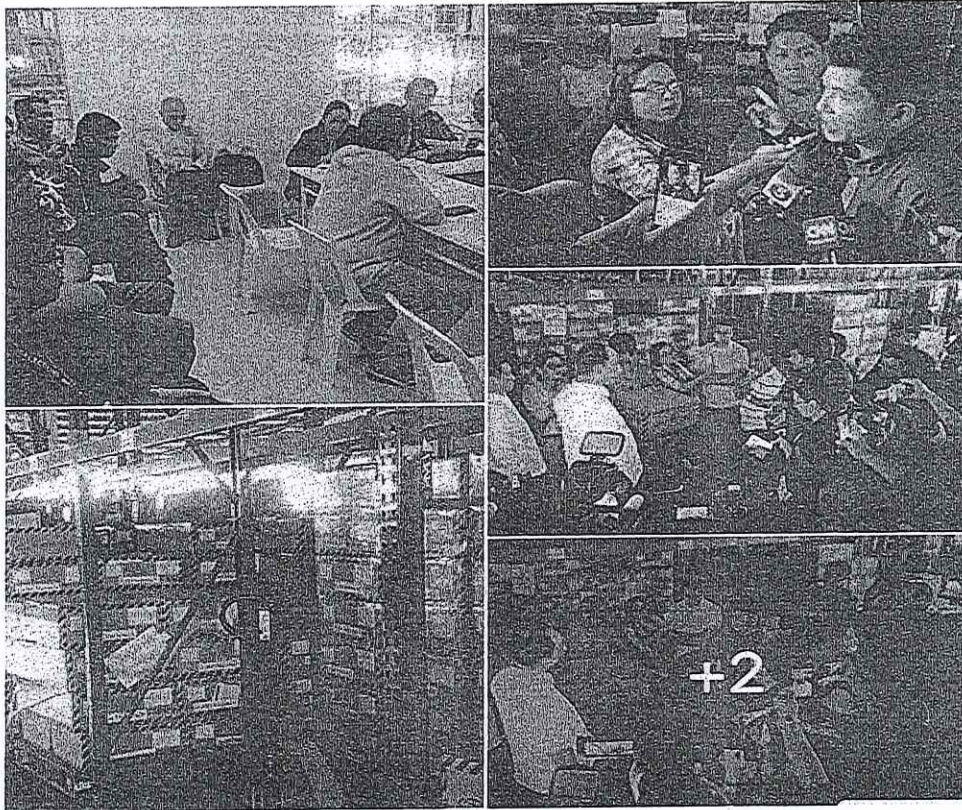
³⁴ A copy of the screenshot of the facebook post dated 20 October 2016 is hereto attached as **Annex "28"** and made an integral part hereof.



Glenn Chong
October 20, 2016 · 🌐

BRIEFING ON THE PROCEDURE FOR THE RETURN OF 1,356 VCMs TO SMARTMATIC

Bilang clean elections advocates, dumalo kami ng kasama kong IT expert mula sa University of California, Los Angeles (UCLA) sa briefing ng COMELEC sa pagsauli ng 1,356 contingent o reserbang VCMs sa SMARTMATIC na diumano ay hindi nagamit noong nakaraang halalan. Ginanap ito sa warehouse ng COMELEC sa Sta. Rosa, Laguna, kahapon....
Continue Reading



26. Atty. Chong poses himself as an advocate for clean elections which would explain his presence during the closure activities.

27. However, there is no record of any request from Atty. Chong to the Honorable Tribunal that he be allowed to observe the proceedings in his capacity as advocate for clean elections.

28. To further compound matters, while Atty. Chong denies ever being present in the Honorable Tribunal, his presence during the Preliminary Conference hearing will belie this.

29. Finally, while Atty. Chong washes his hands of any connection, he was named as one of the witnesses of protestant Marcos for the dismissed First Cause of Action.

30. While all these circumstances might be innocent enough, Atty. Chong is first and foremost an officer of the court being a lawyer.

31. Recently, in the Resolution dated 26 June 2018, the Honorable Tribunal made the following pronouncements:

"Inasmuch as the Protest is still pending with the Tribunal, the parties and their representatives are necessarily charged with restraint in making statements that may rejudge the outcome of the case.

The Tribunal takes particular note of the statements to the media regarding the condition of the ballot boxes undergoing revision (*e.g.*, recently wet ballots, missing audit logs). Clearly, such statement were circulated to insinuate fraud and anomalies attended the 2016 National and Local Elections, which could inevitably lead to the prejudgment of the Tribunal's disposition of the case. In the same vein, statements and other releases to the media regarding the merits of a pending incident with the Tribunal could, unquestionably, exert pressure on the Tribunal's judicial process with the aid of public sympathy.

The parties' continuous discourse of pending issues outside of the four walls of the Tribunal, irrespective of

whether they are in fact retaliatory, tend to sway public opinion, which could ultimately destroy the public's confidence in the Tribunal's resolution of the Protest. Given the highly political nature of this case, the Tribunal must remain insulated from extraneous influence or pressure to guarantee that only the interests of justice are satisfied." [Emphasis supplied.]

32. With his denials, Atty. Chong has fancied himself beyond the ambit of the *sub judice* rule.

33. Effectively, Atty. Chong has managed to do what the Honorable Tribunal has prohibited the parties, their counsels and representatives from doing.

34. Unquestionably, Atty. Chong has been discussing the merits of this case not only in his facebook page but in the Senate Committee on Electoral Reforms hearing.

35. From the foregoing, it clearly appears that there is no truth to Atty. Chong's self-serving claim that he is an advocate for clean election – his advocacy, if ever is limited to his fellow loser in election, i.e., the protestant, who like Atty. Chong cannot accept defeat in good grace. His actuations do not show the kind of candor and respect a lawyer worth the title should accord the Honorable Tribunal.

36. Knowingly fully well that the Province of Camarines Sur is one of the pilot provinces chosen by protestant Marcos, Atty. Chong still discussed the imagined irregularities he observed in the Municipality of Ragay, Camarines Sur.

37. Inevitably, without mentioning names, Atty. Chong has delved into the merits of this case and attempted to not only sway public opinion but also pre-empt any Resolution of the Honorable Tribunal.

38. In the end, no matter how passionate a lawyer is towards defending his cause or what he believes in, he must not forget to display the appropriate decorum expected of him, being a member of the legal profession, and to continue to afford proper and utmost respect due to the courts.³⁵

39. And while the Senate Committee on Electoral Reforms is an independent body, Atty. Chong still testified under oath during the hearing.

40. Being a lawyer, Atty. Chong knows and appreciates the gravity of an oath taken by any witness.

41. Given the data and documents in the possession of Atty. Chong who claims that he is not a lawyer of, representative or in any way connected to protestant Marcos, there is a need for the conduct of an investigation.

42. It is after all disturbing how someone who claims to have no apparent connection to the parties in this case has been able to get a copy of the audit logs from the Municipality of Ragay, Camarines Sur.

43. This motion is not intended for delay but dictated solely by the foregoing exigencies.

PRAYER

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed to the Honorable Tribunal that an INVESTIGATION be conducted on how the Audit Logs were leaked and came into the possession of Atty. Glenn Chong.

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

³⁵ RE: Show Cause Order in the Decision dated May 11, 2018 in G.R. No. 237428 (Republic of the Philippine, represented by Solicitor General Jose C. Calida v. Maria Lourdes P.A. Sereno), A.M. No. 18-06-01-SC, July 17, 2018.

Pasig City for Manila. 10 September 2018.

ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee

Maria Leonor G. Robredo

13 Cagayan Valley Street,

Philamlife Village, Las Pinas City

Telephone No. 0918-9107454

Roll No. 29040

PTR No. 11437242J/10 January 2018/Las Pinas City

IBP Lifetime No. 0724

MCLE Compliance No. V-0018139/13 April 2016

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SARDILLO SARDILLO SALOM LAW OFFICE

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By


MARIA BERNADETTE V. SARDILLO

Roll No. 45897

PTR No. 3474221/03 January 2018/Pasig City

IBP Lifetime No. 07133

MCLE Compliance No. V-0010907/30 September 2015

beng.sardillo@s3law.com

REQUEST

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

Please submit the foregoing "Urgent Motion for Investigation of the Leaked Data from the Province of Camarines Sur" 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 undersigned counsel will submit the foregoing "*Urgent Motion for Investigation of the Leaked Data from the Province of Camarines Sur*" for the consideration and approval of the Honorable Tribunal immediately upon receipt thereof without need for further oral arguments.


MARIA BERNADETTE V. SARDILLO

Copy furnished:

ATTY. GEORGE ERWIN M. GARCIA
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Legaspi Village, 1229 Makati City

EXPLANATION

Due to unavailability of messengers and the distance of the parties, a copy of the herein "Motion" were sent to the above-named parties by registered mail.


MARIA BERNADETTE V. SARDILLO