

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

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

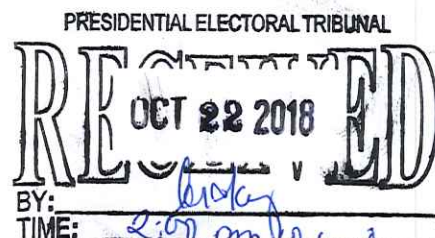
*Protestant,*

-versus-

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

*Protestee.*

X - - - - - X



**PET Case No. 005**

For: Election Protest  
 Vice-President

## **COMMENT**

[TO PROTESTEE'S FOURTH MANIFESTATION OF GRAVE CONCERN  
 WITH URGENT MOTION FOR THE IMMEDIATE INVESTIGATION OF  
 THE LEAKED DATA FROM THE PROVINCE OF CAMARINES SUR]

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.**  
 ("protestant Marcos"), through the undersigned counsels, unto this  
 Honorable Presidential Electoral Tribunal ("PET"), in compliance with  
*Resolution* dated **18 September 2018**, copy of which was received  
 on **11 October 2018**, most respectfully alleges following:

1. *First*, Atty. Glenn Chong ("Atty. Chong") is not part of the  
 legal team of protestant Marcos. He was never engaged by protestant  
 Marcos as legal counsel for this election protest. This is easily verifiable  
 from the records of the above-entitled case.

2. Any claim to the contrary is flagrant **LIE**.

3. *Second*, it was Atty. Jose Amor M. Amorado ("Atty.  
 Amorado"), one of the legal counsels of protestant Marcos, who  
 included Atty. Chong as one of the witnesses for the protestant in  
 support of the original First Cause of Action of this election protest.

4. According to Atty. Amorado, the inclusion of Atty. Chong is  
 based on the latter's personal knowledge and expert opinion regarding

the electoral frauds committed by Smartmatic since the advent of automated election in the Philippines. Protestant Marcos was also advised by Atty. Amorado that Atty. Chong is an advocate of clean and honest elections.

5. *Third*, it was also Atty. Amorado who included Atty. Chong as one of the representatives for protestant Marcos during the revision proceedings before this Honorable Tribunal and the decryption, stripping and turnover activities before the Commission on Elections (Comelec). He likewise included Atty. Chong to be among the observers during the preliminary conference before this Honorable Tribunal.

6. Again, according to Atty. Amorado, the accommodation extended to Atty. Chong is premised on the latter's advocacy for clean and honest elections.

7. It must be clarified, however, that Atty. Chong's participation in the undertakings/proceedings mentioned above is **strictly LIMITED** to merely observing the proceedings. He was never given any authority to represent and/or speak for and on behalf of protestant Marcos.

8. *Fourth*, protestant Marcos and his legal team did not provide Atty. Chong with copies of pleadings, resolutions, documents, decrypted ballot images, audit logs and any other data in connection with this election protest. Atty. Chong should clarify where he obtained the said documents supposedly posted on his facebook page as well as those which he allegedly utilized as part of his testimony before the senate hearings but these were definitely NOT sourced from the protestant.

9. Finally, protestant Marcos is INCOMPETENT to comment on the other contentions of the protestee against Atty. Chong because he has **NO PERSONAL KNOWLEDGE** thereof. These matters should be addressed directly to Atty. Chong.

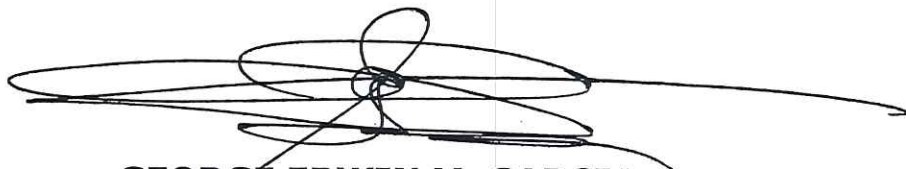
Respectfully submitted.

City of Manila, Philippines, **20 October 2018.**



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By:



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*Copies furnished:*

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**ATTY. GLENN CHONG**

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**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 *Comment* 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 October OCT 22 2018, I served a copy of the following pleading/paper.

## NATURE OF PLEADING/PAPER

### "COMMENT"

[TO PROTESTEE'S FOURTH MANIFESTATION OF GRAVE CONCERN WITH URGENT MOTION FOR THE IMMEDIATE INVESTIGATION OF THE LEAKED DATA FROM THE PROVINCE OF CAMARINES SUR]

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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**ATTY. GLENN CHONG**  
1226 Acacia Street  
Dasmarinas Village, Makati City

#### R. R. Nos.

RD 989401452 22

RD 989401435 22

RD 989401449 22

RD 989401466 22

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.

October OCT 22 2018, Manila, Philippines.

**JERRY C. GUEVARRA**  
Affiant

**SUBSCRIBED AND SWORN** to before me this OCT 22 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 1040  
Page No. 8  
Book No. XII  
Series of 2018.

**ATTY. RAYLA MONTINO**  
NOTARY PUBLIC  
UNTIL DECEMBER 31, 2019  
PTR NO. 6979843-2018  
PD. 12/28/17 MANILA  
ISP LIFETIME NO. 012899  
SCROLL NO. 572199  
MCLE COMP. NO. V-0019704  
UNIT 2A 6818 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 **"COMMENT"** [TO PROTESTEE'S FOURTH MANIFESTATION OF GRAVE CONCERN WITH URGENT MOTION FOR THE IMMEDIATE INVESTIGATION OF THE LEAKED DATA FROM THE PROVINCE OF CAMARINES SUR] 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: October 22, 2018

**SUBSCRIBED AND SWORN** to before me this OCT 22 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 1039 ;  
Page No. 8 ;  
Book No. XII ;  
Series on 2018.

**ATTY. RAUL R. MONTINO**  
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INTRAMUROS, MANILA 1000

Person Administering Oath