

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

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

-versus-

**P.E.T. Case No. 005**

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

X-----X

## **COMPLIANCE**

Comes now **CITY TREASURER OF NAGA CITY** most respectfully avers that:

1. On 16 November 2018, she received the Notice stating that a Resolution dated October 16, 2018, directing her, among others, to explain within ten (10) days the condition of the ballots that (a) in the Incident Report dated October 8, 2018 re: Clustered Precinct No. 99 (Precincts 0208B, 0209A, 0209B and 0210A), Brgy. Sabang, Naga City, Camarines Sur at Table No. 50 was described as "Wet and damaged ballots; Election Returns and MOV are also wet; All the ballots are wet; Although some of them are still readable, they cannot be separated without being damaged; Half of the ballots have already been torn; No longer readable;" (b) in the Incident Report dated October 8, 2018 re: Clustered Precinct No. 104 (Precincts 217C, 218A, 218B and 218C), Barangay San Felipe, Naga City, Camarines Sur at Table No. 15 was described as "Wet/Damaged Ballots; No longer readable;" (c) in the Incident Report dated October 8, 2018 re: Clustered Precinct No. 109 (Precincts 0223B,

0223C and 0233D), Barangay San Felipe, Naga City, Camarines Sur at Table No. 30 was described as "Ballots are wet and damaged rendering revision impossible; voters' receipts are still intact and can be counted; and (d) in the Incident Report dated October 8, 2018 re: Clustered Precinct No. 110 (Precincts 224A, 224B, 225A, 226A and 226B), Brgy. San Francisco (POB), Naga City, Camarines Sur at Table No. 41 which was described as "Due to wetness and molds, physical count of ballots is not possible."


2. In compliance therewith, it should be noted that all 129 ballot boxes that were utilized during the May 9, 2016 National and Local Elections were warehoused in the storage room located in the Naga City Sports Complex in Barangay Pacol, Naga City, where, as in previous elections, said ballot boxes were kept.
3. The undersigned sought the approval of Atty. Cinderella F. Ferreras-Lozano, Acting City Election Officer, Commission on Elections, Naga City to transfer the said ballot boxes on June 4, 2016 from 8 o'clock in the morning to 5 o'clock in the afternoon, and the latter gave her consent. Notably, all major political parties were furnished a copy of the said letter-request. Attached is the undersigned's May 31, 2016 letter-request to transfer and Atty. Ferreras-Lozano's letter approving the request marked as **Annexes "A" and "B"**, respectively;
4. The location of the storage room in the Naga City Sports Complex was such that, we believed and there was no reason to think otherwise, the ballot boxes would be protected not only from theft but also from the elements. However, typhoon "Nina" that hit the Bicol Region, including Naga City, sometime in December 2016 was of such strength that it shattered the windows in the storage room drenching some of the ballot boxes and damaging a few. This was discovered only after the retrieval team came sometime in November 2017.

**WHEREFORE**, premises considered, it is most respectfully prayed that this Compliance be duly noted.



Other reliefs just and equitable are likewise prayed for.

Naga City for Manila, Philippines; 23 November 2018.

  
**GREGORIA NILDA BONCODIN-ABONAL**  
City Treasurer  
Naga City

Copy furnished:

By registered mail

**Atty. George Erwin M. Garcia and  
Atty. Joan M. Padilla**  
G.E. Garcia Law Office  
G/F Laiko Bldg.  
372 Cabildo St., Intramuros 1002 Manila

**Ret. Justice Jose C. Vitug**  
373 Matienzo St., San Miguel Manila

**Atty. Angelito C. Imperio**  
17 Third St., St. Ignatius Village, Quezon City

**Atty. Romulo B. Macalintal**  
Sardillo Sardillo Salom Law Office  
Unit 802, Taipan Place  
F. Ortigas Ave., Ortigas Center, Pasig City

**Office of the Solicitor General**  
134 Amorsolo St., Legaspi Village, 1229 Makati City