

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

**SUPPLEMENTAL MANIFESTATION
(ON THE COUNTER-MANIFESTATION WITH COMMENT
AND OPPOSITION DATED 14 JANUARY 2019)**

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

1. On 04 January 2019, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received a copy of the Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated 10 December 2018 ("Manifestation and Motion") filed by protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity).

2. Thereafter, on 14 January 2019, protestee Robredo filed her Counter-Manifestation with Comment and Opposition (on the Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated 10 December 2018).

3. Since then, the revision, recount and re-appreciation of the official ballots from the three (3) pilot

provinces designated by protestant Marcos have been concluded.

4. To date, only the ballots from the precincts that were suspended or with wet ballots are subject of the revision, recount and re-appreciation proceedings.

5. Based on the data of both parties culled from revision, recount and re-appreciation proceedings, prior to the Resolution dated 18 September 2018 or upon the application of the **fifty percent (50%) threshold**, the physical count of the ballots yielded the following results:

PROVINCE OF CAMARINES SUR						
Municipality	Election Returns		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
BATO	1,255	14,674	1,249	14,649	6	25
BAAO	1,296	18,555	1,280	18,438	16	117
BALATAN	717	9,470	717	9,410	0	60
SAGNAY	517	9,838	510	9,796	7	42
BULA	1,158	21,340	1,151	21,271	7	69
BUHI	1,271	24,738	1,256	24,562	15	176
OCAMPO	658	15,203	651	15,165	7	38
PILI	2,297	28,209	2,296	28,189	1	20
MAGARAO	483	12,122	483	12,108	0	14
GARCHITORENA	396	8,112	389	8,022	7	90
LAGONROY	1,066	21,800	1,045	21,567	21	233
CAMALIGAN	503	9744	503	9,739	0	5
PRESENTACION	636	8,131	627	8,052	9	79
CANAMAN	313	5,568	311	5,545	2	23
SAN FERNANDO	503	14,267	502	14,159	1	108
GAINZA	258	5,418	256	5,402	2	16
MINALABAC	864	18,923	852	18,788	12	135
MILAOR	815	13,275	808	13,140	7	135
SIPOCOT	1,651	18,176	1,631	17,918	20	258
DEL GALLEG0	799	7,709	787	7,537	12	172
PASACAO	1,498	15,443	1,468	15,232	30	211
PAMPLONA	553	13,147	550	12,959	3	188
LUPI	657	9,625	651	9,518	6	107
LIBMANAN	2,619	37,536	2,584	37,089	35	447
RAGAY	2,012	16,923	1,980	16,679	32	244

GOA	1,004	19,877	986	19,520	18	357
CABUSAO	589	7,505	585	7,425	4	80
CARAMOAN	753	15,971	737	15,633	16	338
TINAMBAC	769	18,701	760	18,445	9	256
TIGAON	1,067	17,185	1,055	16,961	12	224
IRIGA CITY	2,964	36,883	2,944	36,493	20	390
NABUA	1,552	25,196	1,529	24,762	23	434
SAN JOSE	719	15,910	708	15,622	11	288
SIRUMA	430	6,702	427	6,607	3	95
NAGA	3,881	58,727	3,880	58,716	1	11
BOMBON	205	7,299	204	7,293	1	6
CALABANGA	1,109	31,897	1,108	31,896	1	1
SUBTOTAL	39,837	639,799	39,460	634,307	377	5,492

PROVINCE OF ILOILO

Municipality	Election Return		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
AJUY	2,118	14,301	2,089	14,064	29	237
ALIMODIAN	1,156	10,762	1,148	10,552	8	210
ANILAO	1,066	9,607	1,052	9,417	14	190
Barotac Nuevo	2,375	17,372	2,344	16,944	31	428
BADIANGAN	771	7,922	757	7,700	14	222
BANATE	1,337	9,629	1,304	9,380	33	249
BINGAWAN	377	4,612	373	4,511	4	101
BALASAN	2,064	8,147	2,012	7,946	52	201
Barotac Viejo	2,035	11,529	1,997	11,201	38	328
BATAD	1,133	4,374	1,111	4,259	22	115
CABATUAN	2,357	16,350	2,327	15,993	30	357
CALINOG	1,978	15,999	1,947	15,567	31	432
CARLES	2,740	14,707	2,678	14,327	62	380
CONCEPCION	1,623	11,298	1,587	10,998	36	300
DINGLE	1,730	14,711	1,712	14,468	18	243
DUENAS	1,120	11,674	1,116	11,501	4	173
DUMANGAS	3,039	22,583	3,020	22,289	19	294
ESTANCIA	3,373	10,277	3,301	10,034	72	243
GUIMBAL	2,492	10,526	2,463	10,355	29	171
IGBARAS	1,582	9,849	1,571	9,671	11	178
JANIUAY	3,165	16,088	3,114	15,754	51	334
LAMBUNAO	2,373	19,983	2,348	19,617	25	366
LEMERY	1,309	9,279	1,290	9,031	19	248
LEGANES	1,510	8,631	1,500	8,483	10	148
LEON	1,548	16,440	1,524	16,100	24	340
MAASIN	1,156	11,967	1,140	11,676	16	291
MIAGAO	2,967	10,926	2,925	10,729	42	197
MINA	906	7,482	895	7,302	11	180

NEW LUCENA	1,219	7,581	1,198	7,373	21	208
OTON	4,604	22,605	4,565	22,259	39	346
PASSI	3,535	23,114	3,486	22,631	49	483
PAVIA	4,072	14,230	4,035	14,040	37	190
POTOTAN	2,937	20,323	2,896	19,895	41	428
SAN DIONISIO	1,854	10,118	1,821	9,848	33	270
SAN ENRIQUE	1,385	10,749	1,368	10,521	17	228
SAN JOAQUIN	1,780	16,001	1,764	15,741	16	260
SAN MIGUEL	1,588	9,443	1,577	9,246	11	197
SAN RAFAEL	703	4,695	690	4,601	13	94
Sta. Barbara	2,957	20,210	2,929	19,883	28	327
SARA	5,465	12,682	5,364	12,291	101	391
TIGBAUAN	2,780	20,647	2,743	20,242	37	405
TUBUNGAN	1,075	7,216	1,069	7,183	6	33
SUBTOTAL	89,047	545,380	87,843	534,364	1,204	11,016

6. Thus, prior to the issuance of the Resolution dated 18 September 2018, the result physical count during the revision, recount and re-appreciation yielded the following:

Province	Election Return		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
Camarines Sur	39,837	639,799	39,460	634,307	377	5,492
Iloilo	87,354	536,639	86,150	525,623	1,204	11,016
TOTAL	127,191	1,176,438	125,610	1,159,930	1,581	16,508

7. Meanwhile, after the issuance of the Resolution dated 18 September 2018 or upon the application of the **twenty five percent (25%) threshold**, the result of the physical count during the revision, recount and re-appreciation yielded the following data:

PROVINCE OF ILOILO						
Municipality	Election Return		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
ZARRAGA	1,693	8,741	1,693	8,741	0	0
TOTAL	1,693	8,741	1,693	8,741	0	0

PROVINCE OF NEGROS ORIENTAL						
Municipality	Election Return		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
AMLAN	936	6,496	936	6,496	0	0
AYUNGON	2,047	7,973	2,047	7,972	0	1
BACONG	1,188	7,648	1,187	7,647	1	1
BAIS	5,944	16,164	5,941	16,160	3	4
BASAY	1,261	4,533	1,260	4,533	1	0
BAYAWAN	9,092	16,281	9,089	16,279	3	2
BINDOY	1,192	6,890	1,189	6,890	3	0
CANLAON	2,415	11,666	2,411	11,666	4	0
DAUIN	1,542	6,168	1,541	6,168	1	0
DUMAGUETE	8,083	26,446	8,078	26,439	5	7
GUIHULNGAN	1,859	10,604	1,858	10,605	1	1
JIMALALUD	696	6,322	695	6,321	1	1
LA LIBERTAD	1,058	8,219	1,053	8,219	5	0
MABINAY	2,731	14,037	2,726	14,037	5	0
MANJUYOD	2,601	8,797	2,600	8,797	1	0
PAMPLONA	1,266	7,493	1,265	7,493	1	0
SAN JOSE	856	4,257	855	4,257	1	0
STA CATALINA	3,909	9,992	3,908	9,991	1	1
SIATON	2,909	11,748	2,907	11,747	2	1
SIBULAN	2,264	9,129	2,263	9,129	1	0
TANJAY	3,523	13,685	3,521	13,685	2	0
TAYASAN	1,215	5,865	1,215	5,862	0	3
VALENCIA	1,890	8,187	1,889	8,186	1	1
VALLEHERMOSO	1,777	7,496	1,773	7,495	4	1
ZAMBOANGUITA	1,320	4,927	1,319	4,927	1	0
TOTAL	64,343	247,556	64,295	247,534	48	22

8. The application of the twenty five percent (25%) threshold yielded a vastly different result:

Province	Election Return		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
Zarraga, Iloilo	1,693	8,741	1,693	8,741	0	0
Negros Oriental	64,343	247,556	64,295	247,534	48	22
TOTAL	66,036	256,297	65,988	256,275	48	22

9. In summary, based on the initial physical count of the ballots from the designated pilot provinces of protestant Marcos or from the Provinces of Camarines Sur, Iloilo and Negros Oriental, the Election Returns and Physical Count will show that:

Province	Election Return		Physical Count		Difference from Physical Count	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
Camarines Sur	39,837	639,799	39,460	634,307	377	5,492
Iloilo	89,047	545,380	87,843	534,364	1,204	11,016
Negros Oriental	64,343	247,556	64,295	247,534	48	22
TOTAL	193,227	1,432,735	191,598	1,416,205	1,629	16,530

10. On the other hand, based on the initial physical count of the ballots, the parties were able to claim a total of **Thirty Nine Thousand Four Hundred Thirteen (39,413)**:

Province	Claims	
	Marcos	Robredo
Camarines Sur	1,794	11,723
Iloilo	2,297	16,544
Negros Oriental	1,387	5,668
TOTAL	5,478	33,935

11. As previously stated, the application of the fifty percent (50%) threshold resulted to an initial difference by both parties in the physical count of the ballots.

12. This initial difference by the parties were thereafter claimed to be counted in their favor:

Province	Difference from Physical Count		Claims		Net Claims (Claims – Difference from Physical Count)	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
Camarines Sur	377	5,492	1,794	11,723	1,417	6,231
Iloilo	1,204	11,016	2,297	16,544	1,093	5,528

Negros Oriental	48	22	1,387	5,668	1,339	5,646
TOTAL	1,629	16,530	5,478	33,935	3,849	17,405

13. Noteworthy is that protestee Robredo was proclaimed with a winning margin of **Two Hundred Sixty Three Thousand Four Hundred Seventy Three (263,473) votes** over protestant Marcos.

14. In order for protestant Marcos to be allowed to proceed with the technical examination in Lanao del Sur, Basilan and Maguindanao, he must first show that he had substantial recovery from his pilot provinces.

15. The numbers speak for themselves.

RESPECTFULLY SUBMITTED.

Pasig City for Manila. 21 January 2019.

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EXPLANATION

Due to unavailability of messengers and the distance of the parties, a copy of the herein "*Supplemental Manifestation (on the Counter-Manifestation with Comment and Opposition*" were sent to the above-named parties by registered mail.


MARIA BERNADETTE V. SARDILLO

Republic of the Philippines)
Pasig City)

**VERIFIED DECLARATION OF COMPLIANCE WITH THE
EFFICIENT USE OF PAPER RULE**

I, **LAILA T. ENDIC**, hereby declare that Supplemental Manifestation (On The Counter-Manifestation With Comment and Opposition Dated 14 January 2019) submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and are true copies of the Supplemental Manifestation (On The Counter-Manifestation With Comment and Opposition Dated 14 January 2019) filed with the Presidential Electoral Tribunal.


Pasig City. 21 January 2019.


LAILA T. ENDIC
Secretary

Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 21st day of January 2019 by affiant LAILA T. ENDIC who is personally known to me, and appeared with her Unified Multi-Purpose ID CRN-0111-3021584-5 issued by Social Security System, known to me as the same person who personally signed the foregoing attestation before me and acknowledged that she executed the same.

Doc. No. 121;
Page No. 26;
Book No. 1;
Series of 2019.


R. JOHN CHRISTOPHER J. SALOM
NOTARY PUBLIC FOR PASIG CITY,
PATEROS AND SAN JUAN CITY
Until December 31, 2019
Appointment No. 205 (2018-2019)
Roll No. 53545
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