

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

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

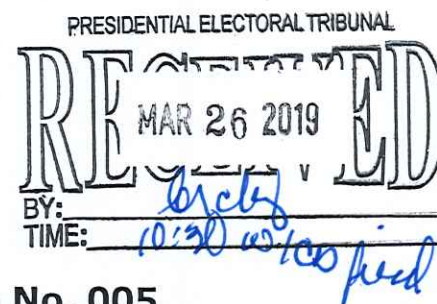
*Protestant,*

-versus-

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

*Protestee.*

X- - - - - X



**PET Case No. 005**

For: Election Protest  
Vice-President

**CONSOLIDATED REPLY**  
**with URGENT MOTION TO RESOLVE**  
**PROTESTANT'S OMNIBUS MOTION**

- i. TO **ISSUE A *SUBPOENA DUCES TECUM*** TO THE VOTERS IDENTIFICATION DIVISION OF THE COMMISSION ON ELECTIONS - ELECTION RECORDS AND STATISTICS DEPARTMENT (COMELEC-ERSD) TO PRODUCE AND SUBMIT THE DACTYLOSCOPIC AND QUESTIONED DOCUMENT REPORTS DATED 5 JUNE 2018 AND SUCH OTHER RELEVANT DOCUMENTS INVOLVING THE TECHNICAL EXAMINATION CONDUCTED ON THE VOTER'S REGISTRATION RECORDS (VRRs) AS AGAINST THE ELECTION DAY COMPUTERIZED VOTER'S LIST WITH VOTING RECORDS (EDCVLS) OF *FIVE HUNDRED EIGHT* (508) ESTABLISHED PRECINCTS IN THE PROVINCES OF LANA DEL SUR, MAGUINDANAO, AND BASILAN USED DURING THE LAST 9 MAY 2016 NATIONAL AND LOCAL ELECTIONS;
- ii. TO **INVESTIGATE** ALL THE CONCERNED CHAIRMEN AND MEMBERS OF THE BOARD OF ELECTION INSPECTORS (BEIs) WHO SERVED IN THE PROVINCES OF LANA DEL SUR,

MAGUINDANAO, AND BASILAN DURING THE LAST 9 MAY 2016 NATIONAL AND LOCAL ELECTIONS TO DETERMINE THEIR INVOLVEMENT AND PARTICIPATION AS TO THE INCIDENCE OF SUBSTITUTED-VOTING IN THE SAID PROVINCES; AND

- iii. TO **IMMEDIATELY DIRECT** THE VOTERS IDENTIFICATION DIVISION OF THE COMELEC-ERSD TO CONDUCT A TECHNICAL EXAMINATION ON THE SIGNATURES AND THUMBPRINTS APPEARING ON THE VRRS AND EDCVLS OF THE ENTIRE TWO THOUSAND SEVEN HUNDRED FIFTY-SIX (2,756) PROTESTED CLUSTERED PRECINCTS OF LANA DEL SUR, MAGUINDANAO, AND BASILAN IN CONNECTION WITH THE LAST 9 MAY 2016 NATIONAL AND LOCAL ELECTIONS.

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

1. On **12 December 2018**, protestant Marcos filed an *Extremely Urgent Manifestation of Grave Concern with Omnibus Motion* ("Omibus Motion"):

- i. To Issue a *Subpoena Duces Tecum* to the Voters Identification Division of the Commission On Elections - Election Records And Statistics Department (COMELEC-ERSD) to Produce and Submit the Dactyloscopic and Questioned Document Reports dated 5 June 2018 and such Other Relevant Documents Involving the Technical Examination Conducted on the Voter's Registration Records (VRRs) as against the Election Day Computerized Voter's List with Voting Records (EDCVLs) of *Five Hundred Eight* (508) Established Precincts in the Provinces of Lanao Del Sur, Maguindanao and Basilan Used During the Last 9 May 2016 National and Local Elections;

- ii. To Investigate All the Concerned Chairmen and Members of the Board of Election Inspectors (BEIs) Who



Served in the Provinces of Lanao Del Sur, Maguindanao and Basilan During the Last 9 May 2016 National and Local Elections to Determine their Involvement and Participation as to the Incidence of Substituted-Voting in the said Provinces; and

iii. To Immediately Direct the Voters Identification Division of the COMELEC-ERSD to Conduct a Technical Examination on the Signatures and Thumbprints Appearing on the VRRS and EDCVLs of the Entire Two Thousand Seven Hundred Fifty-Six (2,756) Protested Clustered Precincts of Lanao Del Sur, Maguindanao and Basilan in Connection with the Last 9 May 2016 National and Local Elections.

2. In said Omnibus Motion, protestant Marcos apprised this Honorable Tribunal of the technical examination conducted by the Voters Identification Division of the COMELEC-ERSD, specifically, on the signatures and/or thumbprints appearing on the VRRs as against the EDVCLs pertaining to the provinces of Lanao Del Sur, Basilan and Maguindanao during the last 2016 elections. Such information was received by protestant Marcos from former Sulu Vice Governor Abdusakur Tan ("**Tan**").

3. According to the result of the technical examination conducted by the Voters Identification Division of the COMELEC-ERSD it appears that there are **FORTY THOUSAND FIVE HUNDRED TWENTY-EIGHT (40,528) SIGNATURES AND THREE THOUSAND TWO HUNDRED NINETY-FIVE (3,295) THUMBPRINTS ON THE EDCVLs USED IN THE FIVE HUNDRED EIGHT (508) ESTABLISHED PRECINCTS OF THE PROVINCES LANA DEL SUR, BASILAN AND MAGUINDANAO DURING THE LAST 2016 ELECTIONS, WHICH ARE NOT IDENTICAL WITH THE ORIGINAL AND GENUINE SIGNATURES AND/OR THUMBRINTS OF THE REAL AND LEGITIMATE VOTERS AS REFLECTED ON THE RELEVANT VRRs IN THE SAID PROTESTED AREAS.** This result is contained in the **Dactyloscopic and Questioned Document Reports** dated 5 June 2018 issued by the Voters Identification Division of the COMELEC-ERSD, a copy of which was attached as Annex "A" of the *Extremely Urgent Manifestation of Grave Concern with Omnibus Motion* dated 10 December 2018.

4. Consequently, the Voters Identification Division of the COMELEC-ERSD concluded that the "**2016 National, Local and**

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**ARMM Elections has (*sic*) been marked with different forms of election fraud such as massive substituted voting.** [Emphasis and underscoring supplied.]

5. In protestee Robredo's *Counter-Manifestation with Comment and Opposition* dated 14 January 2019 ("Counter-Manifestation"), she argues that the protestant's Omnibus Motion is "extremely premature and a deceitful way of circumventing the 2010 Rules of the Presidential Electoral Tribunal ("2010 PET Rules")." Furthermore, she averred that the filing of the Omnibus Motion was designed to expand protestant's pilot protested provinces.

6. Protestee's argument is utterly **MISLEADING**.

7. In filing the Omnibus Motion, protestant Marcos does not in any way intend to expand his pilot protested provinces, which is the subject matter of his Third Cause of Action. On the contrary, protestant Marcos filed the Omnibus Motion as a response to the massive election fraud in the ARMM elections, in order to **preserve and safeguard vital documentary evidence, which is crucial in proving his Third Cause of Action.**

8. To recall, protestant Marcos' Second and Third Causes of Actions are **SEPARATE**, **DISTINCT** and **INDEPENDENT** causes of actions.

9. On one hand, the **Second** Cause of Action calls for the conduct of judicial revision and recount of the ballots, decrypted ballot images and other election documents to **verify if the results** thereof match with what is reflected on the Statement of Votes (SOVs) and other election documents. On the other hand, the **Third** Cause of Action seeks **the annulment of the election results for the position of Vice President** in the provinces of LANAOS DEL SUR, BASILAN AND MAGUINDANAO due to widespread terrorism, violence, force, threats, force, intimidation, pre-shading of ballots and massive substitution of voters thereat.

10. As basis for her Counter-Manifestation, protestee Robredo alleged that protestant Marcos, through his lead counsel, Atty. George Erwin M. Garcia admitted during the Preliminary Conference that the provinces of Maguindanao, Lanao Del Sur and Basilan are **supposedly included** in the Second Cause of Action. This is again **bereft of any truth and a clear tactic of protestee to muddle the issues.**



11. The very quotation cited by protestee Robredo in her Counter-Manifestation, which was supposedly taken from page 12 of the Transcript of Stenographic Notes ("TSN") dated 11 July 2017, effectively **BELIES** her assertion.

12. In the said **TSN**, Atty. Garcia clearly stated that the provinces of **Maguindanao, Lanao del Sur and Basilan are EXCLUDED from the coverage of protestant's Marcos' Second Cause of Action**, to wit:

"ATTY. GARCIA:

No. Your Honor. As far as the **First** Cause of Action is concerned, that is limited only to proving the non-authenticity of the documents used for purposes of the canvass. The **Second** Cause of Action will be limited solely, Your Honor, to the thirty (30) provinces and cities as enumerated in our Second Cause of Action. Meaning to say, Your Honor, with all due respect, even if the contention may be that the entire COCs used during the canvass for the Vice-President are not authentic, just the same, Your Honor, we will limit only the request for the collection, the revision and the manual recount of the ballots as far as we are concerned on the 39,221 or the 26,000 **excluding the three (3) provinces of Maguindanao, Lanao del Sur and Basilan, Your Honor.**"  
[Emphasis and underscoring supplied.]

13. Moreover, the **Third** Cause of Action, which calls for the annulment of election results for the position of Vice President in the provinces of Maguindanao, Lanao Del Sur and Basilan on the ground of terrorism, intimidation and harassment of voters, pre-shading of ballots and substitution of voters, is **necessarily excluded** from the coverage of the pilot protested provinces as mandated by **Rule 65** of the **2010 PET Rules** given that the same **does not involve any judicial revision and recount of votes or correction of manifest errors**, thus:

**Rule 65. Dismissal; when proper.** – The Tribunal may require the protestant or counter-protestant to indicate, within a fixed period, the province or provinces numbering not more than three, best exemplifying the frauds or irregularities alleged in his petition; **and the revision of ballots and reception of evidence will begin with such provinces.** If upon examination of such ballots and proof, after making reasonable allowances, the Tribunal is convinced that, taking all circumstances into account, the protestant or counter-protestant will most probably fail to make out

his case, the protest may forthwith be dismissed, without further consideration of the other provinces mentioned in the protest.

**The preceding paragraph shall also apply when the election protest involves correction of manifest errors.**

[Emphasis and underscoring supplied.]

14. Based on the above Rule, it is very evident that protestee Robredo's contention that the latest Omnibus Motion of protestant Marcos will unduly expand his pilot protested provinces has no leg to stand on.

15. It is worth reiterating that the requested technical examination, which is the subject of the foregoing Omnibus Motion, was prompted by a **VERY SIGNIFICANT SUPERVENING EVENT**, which is the finding and conclusion of the Voters Identification Division of the COMELEC-ERSD that the "**2016 National, Local and ARMM Elections has (*sic*) been marked with different forms of election fraud such as massive substituted voting.**"

16. It is humbly submitted that it would be the height of injustice if this Honorable Tribunal simply turned a blind eye on the **MASSIVE SUBSTITUTED VOTING** which attended the 2016 National, Local and ARMM Elections in the provinces of Maguindanao, Lanao del Sur and Basilan.

17. This development is a matter of transcendental importance not only to protestant Marcos but to the entire Filipino electorate considering that **what is involved is the integrity and legitimacy of the election results for the position of Vice President, which is the second highest executive position in the Philippines.**

18. Time and again the Supreme Court has held that [E]lection contests involve public interest, and technicalities and procedural barriers should not be allowed to stand if they constitute an obstacle to the determination of the true will of the electorate in the choice of their elective officials.<sup>1</sup>

19. The standing rule is that laws governing election contests must be liberally construed to the end that the will of the people in the

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<sup>1</sup> Charito Navarosa v. COMELEC, G.R. No. 157957, 18 September 2003 citing Juliano v. Court of Appeals, 127 Phil. 207 (1967)



choice of public officials may not be defeated by mere technical objections. In an election case **the court has an imperative duty to ascertain by all means within its command who is the real candidate elected by the electorate.**<sup>2</sup>

20. Furthermore, it is well settled both in law and jurisprudence that election laws should be reasonably and liberally construed to achieve their purpose - to effectuate and safeguard the will of the electorate in the choice of their representatives. **The courts frown upon any interpretation that would hinder in any way not only the free and intelligent casting of votes in any election but also the correct ascertainment of the results thereof.**<sup>3</sup>

21. Guided by the foregoing and in the higher interest of substantial justice, it is the humble position of protestant Marcos that there is an imperative need for this Honorable Tribunal to grant his Omnibus Motion in order to finally determine if **massive substituted voting** attended the 2016 National, Local and ARMM Elections in the provinces of Maguindanao, Lanao del Sur and Basilan.

22. With respect to the application of the *sub judice* rule, which was proposed by the COMELEC in its *Manifestation (In lieu of a Comment on Protestant Marcos' Extremely Urgent Manifestation of Grave Concern with Omnibus Motion)* dated 5 February 2019, the same is completely **MISPLACED**.

23. The restriction imposed by *sub judice* rule has **NO APPLICATION** to the Omnibus Motion filed by protestant Marcos given that the **disclosure will be limited to this Honorable Tribunal and the parties in this election protest.**

24. It is pertinent to note that the protested areas covered by EPC Case No. 2016-37 entitled "Abdusakur M. Tan versus Mujiv S. Hataman," which is pending before the COMELEC Second Division, is likewise covered by the election protest of Marcos.

25. At the risk of being repetitious, the protested provinces of **Maguindanao, Lanao del Sur and Basilan** were **specifically identified** as part of the **Third** Cause of Action of protestant Marcos.

<sup>2</sup> *Id.*, emphasis and underscoring supplied.

<sup>3</sup> *Hipe vs. Commission on Elections*, 602 SCRA 565, G.R. No. 181528, 2 October 2009, emphasis and underscoring supplied.



According to the election protest of Marcos, there is substantial basis for the annulment of the election results in the provinces of Lanao Del Sur, Maguindanao, and Basilan in view of the widespread presence of terrorism, violence, threats, coercion, force, intimidation, and the proliferation and batch-feeding of pre-shaded ballots in each of the **two thousand seven hundred fifty six (2,756)** protested clustered precincts in the said areas.

26. With the admission of the COMELEC in its *Manifestation* dated 5 February 2019 that the Voter's Identification Division of the COMELEC-ERSD submitted its report on the Technical Examination results conducted on the VRRs as against the EDCVLs of *Five Hundred Eight* (508) established precincts in the Provinces of Lanao Del Sur, Maguindanao and Basilan used during the 9 May 2016 National and Local Elections, **then it is crucial and imperative that this report should also be utilized in this case given that the precincts subjected to technical examination are also covered by this election protest.**

27. That being the case, protestant Marcos humbly moves for this Honorable Tribunal to resolve his *Extremely Urgent Manifestation of Grave Concern with Omnibus Motion* dated 10 December 2018. Again, he is willing to shoulder the administrative costs and expenses relative to this request.

28. Finally, with regard to the self-serving claim of protestee Robredo that there was failure on the part of protestant Marcos to establish substantial recovery in his pilot province, the same deserves **scant consideration.**

29. This Honorable Tribunal should not be swayed by the figures submitted by protestee Robredo which were obviously **manufactured** to preempt the conduct of the Preliminary Appreciation of the Revised Ballots by this Honorable Tribunal.

30. The figures released by protestee Robredo, which supposedly reflects the physical count of the ballots during the revision and recount proceedings in this case, are **CONTRIVED** and serve no purpose other than to **CONDITION** the minds of the general public that the election protest of Marcos will eventually be dismissed. By releasing these spurious figures, protestee Robredo is purposely **DIVERTING** the Filipino electorate's attention from the conclusion of



the Voters Identification Division of the COMELEC-ERSD that the **"2016 National, Local and ARMM Elections has (*sic*) been marked with different forms of election fraud such as massive substituted voting."**

31. It is high time for protestee Robredo to squarely address the fact that there was **MASSIVE SUBSTITUTED VOTING** in the provinces of **BASILAN, LANA DEL SUR, and MAGUINDANAO** during the 2016 National, Local and ARMM Elections considering that she purportedly obtained **FOUR HUNDRED SEVENTY-SEVEN THOUSAND NINE HUNDRED EIGHTY-FIVE (477,985) VOTES** in these areas.

32. More than a thousand days have passed since Marcos filed his election protest in 29 June 2016. So much has happened in this period of time. We are now in the middle of the campaign period for the **next** election. The May 13, 2019 elections is barely 7 weeks away and we still do not know the **true results** of the last election. Everyone will agree that three years is way too long to wait for the **true results** of something as **important** as the **second highest position** in the country. The voters want their votes to be counted. They expect no less.

### **PRAYER**

**ACCORDINGLY**, it is most respectfully prayed of this Honorable Tribunal to:

- 1) **NOTE** the foregoing *Consolidated Reply with Urgent Motion to Resolve the Omnibus Motion* and **GRANT** the *Omnibus Motion*;
- 2) **ISSUE** a *subpoena duces tecum* to the Voters Identification Division of the COMELEC-ERSD to produce and submit the Dactyloscopic and Questioned Document Reports dated 5 June 2018 and such other relevant documents involving the technical examination conducted on the VRRs as against the EDCVLs of *Five Hundred Eight (508)* established precincts in the provinces of Lanao Del Sur, Maguindanao, and Basilan during the last 9 May 2016 National and Local elections;
- 3) **INVESTIGATE** all the concerned Chairmen and Members of the BEIs who served in the provinces of Lanao Del Sur, Maguindanao, and Basilan during the last 9 May 2016 National



and Local elections to determine their involvement and participation with respect to the incidents of substituted-voting in the said provinces; and

- 4) **DIRECT** the Voters Identification Division of the COMELEC-ERSD to conduct a technical examination on the signatures and/or thumbprints appearing on the VRRs and EDCVLs of the entire *Two Thousand Seven Hundred Fifty-Six (2,756)* protested clustered precincts of Lanao Del Sur, Maguindanao, and Basilan in connection with the last 9 May 2016 National and Local elections.

**OTHER RELIEFS**, just and equitable under the premises, are likewise prayed for.

City of Manila, Philippines, **22 March 2019.**

**G.E. GARCIA LAW OFFICE**

*Lead Counsel for the Protestant*

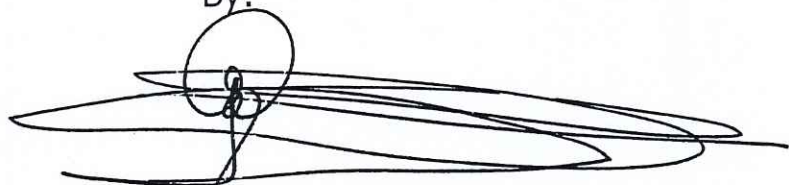
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By:



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MCLE Compliance No. VI- 0006563; 02-19-18



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MCLE Compliance No. VI-0005694; 01-10-2018

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## NOTICE OF SUBMISSION

### **THE CLERK OF THE TRIBUNAL**

Presidential Electoral Tribunal  
Padre Faura, Manila

### **ATTY. ROMULO B. MACALINTAL**

*Lead Counsel for Protestee Robredo*  
c/o Sardillo Sardillo Salom Law Office  
Unit 802, Taipan Place, F. Ortigas Aven  
Ortigas Center, Pasig City

### **THE SOLICITOR GENERAL**

134 Amorsolo Street  
Legaspi Village, 1229 Makati City

### **THE COMMISSION ON ELECTIONS**

Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

### **VOTERS IDENTIFICATION DIVISION**

COMMISSION ON ELECTIONS  
Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

### **ELECTION RECORDS AND STATISTICS**

COMMISSION ON ELECTIONS  
Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

*Greetings:*

Please take notice that the foregoing *Consolidated Reply with Urgent Motion to Resolve* shall be submitted for the consideration and approval of this Honorable Tribunal immediately upon receipt hereof.

  
**GEORGE ERWIN M. GARCIA**

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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 *Consolidated Reply with Urgent Motion to Resolve* were served to the above-mentioned parties by registered mail, personal service being impractical due to 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 March 26, 2019, I served a copy of the following pleading/paper.

## **NATURE OF PLEADING/PAPER**

### **"CONSOLIDATED REPLY with URGENT MOTION TO RESOLVE PROTESTANT'S OMNIBUS MOTION"**

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,  
Ortigas Center, Pasig City

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

RE 044 024 694 22

**THE SOLICITOR GENERAL**  
134 Amorsolo Street  
Legaspi Village, 1229 Makati City

RE 044 024 709 22

**THE COMMISSION ON ELECTIONS**  
Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

RE 044 024 717 22

**VOTERS IDENTIFICATION DIVISION**  
COMMISSION ON ELECTIONS  
Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

RE 044 024 725 22

**ELECTION RECORDS AND STATISTICS DEPARTMENT**  
COMMISSION ON ELECTIONS  
Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

RE 044 024 734 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.

**MAR 26 2019**

March \_\_\_\_, 2019, Manila, Philippines.

**JERRY C. GUEVARRA**  
*Affiant*

**MAR 26 2019**

**SUBSCRIBED AND SWORN** to before me this 26 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 62  
Page No. 13  
Book No. 11  
Series of 2019.

**ATTY. LLOYD ALLAIN A. CUDAL**  
NOTARY PUBLIC  
UNTIL DECEMBER 31, 2020  
PTR NO. 7930983 MLA 11-15-2018  
IBP NO. 025208 PASIG 1-10-18  
NOTARIAL COMMISSION NO. 2019-011  
ROLL NO. 52809  
MCLE NO. VI-0014175 10-10-2018  
RM 310 NPC BLDG., INTRAMUROS, MANILA



## **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 **"CONSOLIDATED REPLY with URGENT MOTION TO RESOLVE PROTESTANT'S OMNIBUS MOTION"** 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: March 26, 2019

**SUBSCRIBED AND SWORN** to before me this MAR 26 2019 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

\_\_\_\_\_  
Person Administering Oath

Doc. No. 103 ;  
Page No. 13 ;  
Book No. 11 ;  
Series on 2019.

**ATTY. LLOYD ALLAIN A. CUDAL**  
NOTARY PUBLIC  
UNTIL DECEMBER 31, 2020  
PTR NO. 7930983 MLA. 11-15-2018  
IBP NO. 025208 PASIG 1-10-18  
NOTARIAL COMMISSION NO. 2019-011  
ROLL NO. 52809  
MCLE NO. VI-0014175 10-10-2018  
RM 310 NPC BLDG., INTRAMUROS, MANILA