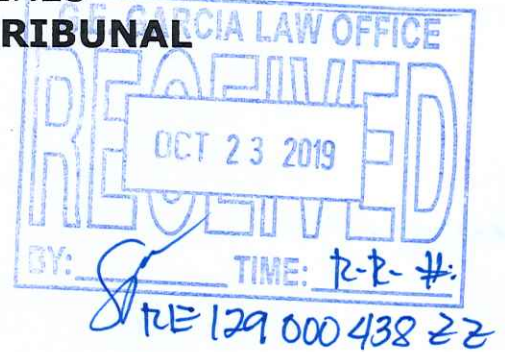


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

**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

MANIFESTATION

God is in the details.

It has become a laughable cliché in Philippine Elections where candidates are never said to have lost – for they can always claim to have been cheated. And while such claims may have held water in the past – as, for example, when COMELEC tabulators had to famously walkout in the historic protest of 09 February 1986, protestant Marcos cannot assert this.

However, as the Honorable Supreme Court has often reminded parties and counsel, at some point, litigation must end. This Election Protest must end based on evidence and the rule of law.

Without any evidence, no matter how loud the cry of cheating may be, this Election Protest must be dismissed.

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

1. Amidst all the speculations on the result of the revision, recount and re-appreciation of ballots from the three (3) pilot provinces, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) filed an Urgent Motion to Be Furnished Copy of the Committee Report on the Revision, Recount and Re-appreciation of Ballots from the Three (3) Pilot Provinces ("Motion").

2. Protestee Robredo was constrained to file the Motion in order to be apprised of the real result of the revision, recount and re-appreciation of ballots from the three (3) pilot provinces – Camarines Sur, Negros Oriental and Iloilo.

3. On 08 October 2019, the Honorable Tribunal deferred the resolution to another day.

4. To date, the Motion has not been resolved.

5. Meanwhile, speculations continue to abound on how the Honorable Tribunal will eventually resolve the issue on whether the above-captioned Election Protest will proceed after the revision, recount and re-appreciation of the ballots from the three (3) pilot provinces.

6. By way of background, on **29 June 2016**, protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity) filed the above-captioned Election Protest.

7. Protestant Marcos hinged his Election Protest on two (2) causes of action:¹

"VI
GROUND IN SUPPORT OF THE
ELECTION PROTEST

¹ Pages 927-929, Election Protest.

A.
(First Cause of Action)

The proclamation of protestee Robredo as the duly elected Vice-President is null and void because the COCs generated by the CCS are not authentic, and may not be used as basis to determine the number of votes that the candidates for Vice-President received for the following reasons:

(1) The reliability of the system employed to canvass the votes received by the candidates for Vice-President was not established before the elections, which was exploited to favor protestee Robredo.

(a) The mandatory requirements of Republic Act No. 8436, as amended, were not shown to have been complied with.

(b) The use of the AES supplied by Smartmatic violated Republic Act No. 8436, as amended.

(2) Other violations of Republic Act 8436, as amended, as well as a confluence of irregularities, and breaches of security protocols and procedures severely undermined the integrity and credibility of the entire electoral exercise, particularly the COCs on the basis of which protestee Robredo was proclaimed as the duly elected Vice-President.

(a) The COMELEC acted unlawfully by issuing and implementing certain resolutions relating to the SD cards of the VCM.

(b) The COMELEC acted unlawfully by reconfiguring **30** CCS of **4** provinces and **26** cities/municipalities contrary to its own contingency procedure.

(c) Smartmatic introduced a new program into the Transparency Server in breach of protocol and without proper authority, and betraying the fact that a software was used in a component of the AES without being subjected to review by political parties and candidates as required by Republic Act No. 8436, as amended.

(d) An intermediary/queue server was unlawfully utilized in gross violation and disregard of Republic Act No. 8436, as amended, and COMELEC Resolution No. 10057.

(e) The AES supplied by Smartmatic was a vulnerable system as per report of SysTest Labs, Inc. ("SLI").

B.
(Second Cause of Action)

**Massive electoral fraud, anomalies
and irregularities, such as but not**

limited to terrorism, violence, force, threats, force, intimidation, pre-shading of ballots, vote-buying, substitution of voters, flying voters, pre-loaded SD cards, misreading of ballots, unexplained, irregular and improper rejection of ballots containing votes for protestant Marcos, malfunctioning VCM, and abnormally high unaccounted votes/undervotes for the position of Vice President compromised and corrupted the conduct of elections and the election results for the position of Vice-President in the protested precincts."²

8. Meanwhile, in compliance with the Summons, on **15 August 2016**, protestee Robredo filed her Verified Answer with Special and Affirmative Defenses and Counter-Protest.

9. With the issues being joined, the Honorable Tribunal directed the parties to file their respective Preliminary Conference Brief.³

10. In compliance therewith, the parties filed their respective Preliminary Conference Briefs.

11. For his part, protestant Marcos confirmed and limited the issues to be resolved based on his two (2) causes of action:⁴

"III. ISSUES TO BE RESOLVED

First Cause of Action – Annulment of Proclamation

² A copy of the Election Protest (without annexes) is hereto attached as **Annex "1"** and made an integral part hereof.

³ Resolution dated 25 April 2017.

⁴ Pages 14-16, Preliminary Conference Brief of protestant Marcos.

III.1. Whether the proclamation of protestee Robredo as the duly elected Vice-President is null and void because the COCs generated by the CCS are not authentic, and may not be used as the basis to determine the number of votes that the candidates for Vice-President received for the following reasons:

a. Whether the reliability of the system employed to canvass the votes received by the candidates for Vice-President was not established before the elections, which was exploited to favor protestee Robredo.

i. Whether the mandatory requirements of Republic Act No. 8436, as amended, were not shown to have been complied with.

ii. Whether the use of the AES supplied by Smartmatic violated Republic Act No. 8436, as amended.

b. Whether the integrity and credibility of the entire electoral exercise, particularly the COCs on the basis of which protestee Robredo was proclaimed as the duly elected Vice-President, were severely undermined by the violations of Republic Act No. 8436, as amended, and the irregularities, and breaches of security protocols and

procedures during the last elections.

- i. Whether the COMELEC acted unlawfully by issuing and implementing certain Resolutions relating to the SD cards of the VCM.
- ii. Whether the COMELEC acted unlawfully by reconfiguring **30** CCS of **4** provinces and **26** cities/municipalities contrary to its own contingency procedure.
- iii. Whether the Smartmatic introduced a new program into the Transparency Server in breach of protocol and without proper authority, and betraying the fact that a software was used in a component of the AES without being subjected to review by political parties and candidates as required by Republic Act No. 8436, as amended.
- iv. Whether an intermediary/queue server was unlawfully utilized in gross violation and disregard of Republic Act No. 8436, as amended, and

COMELEC Resolution
No. 10057.

- v. Whether the AES
supplied by
Smartmatic was a
vulnerable system as
per report of SysTest
Labs, Inc. ("SLI").

*Second Cause of Action – Annulment of
Election Results and Judicial Recount
and Revision.*

III.2. Whether the election results in
the provinces of Lanao del Sur, Basilan
and Maguindanao should be annulled
due to widespread terrorism, violence,
force, threats, force, intimidation, pre-
shading of ballots, and substitution of
voters thereat.

III.3. Whether there existed massive
electoral fraud, anomalies and
irregularities, such as, but not limited to
terrorism, violence, threats, force,
intimidation, pre-shading of ballots,
vote-buying, substitution of voters,
flying voters, pre-loaded SD cards,
misreading of ballots containing votes
for protestant Marcos, malfunctioning
VCM, and abnormally high unaccounted
votes/undervotes for the position of
Vice-President in the protested
precincts.

III.4. Whether protestant Marcos
should be proclaimed as the duly
elected and rightful Vice-President of
the Republic of the Philippines for
having obtained the highest number of
valid votes cast for the said office
during the 09 May 2016 National and
Local Elections."⁵

⁵ A copy of the Preliminary Conference Brief of protestant Marcos is hereto attached
as **Annex "2"** and made an integral part hereof.

12. To further confirm that protestant Marcos had only two (2) causes of action, pursuant to **Rule 65⁶ of the 2010 Rules of the Presidential Electoral Tribunal**, the following three (3) provinces were designated:⁷

"V. LIST OF PROVINCES FOR THE PILOT PROTEST PURSUANT TO RULE 65 OF THE 2010 PET RULES

Protestant Marcos is hereby designating the provinces of **CAMARINES SUR, ILOILO** and **NEGROS ORIENTAL** as his pilot areas for the **MANUAL RECOUNT** and **JUDICIAL REVISION** of the paper ballots and/or the ballot images as well as the **TECHNICAL EXAMINATION, FORENSIC INVESTIGATION, VERIFICATION** and **ANALYSIS** of the voter's receipts, election returns, audit logs, transmission logs, the lists of voters, particularly the Election Day Computerized Voter's List (EDCVL), and voters registration records (VRRs), the books of voters and other pertinent election documents and/or paraphernalia used in the elections, as well as the automated election equipment and records such as the Vote Counting Machine (VCM), Consolidation and Canvassing System (CCS) units, Secure Digital (SD) cards (main and back up), and the other data

⁶ Rule 65 of the 2010 Rules of the Presidential Electoral Tribunal provides:

"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, and 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.

⁷ Pages 74-75, Preliminary Conference Brief of protestant Marcos.

storage devices containing electronic data and ballot images used during the 09 May 2016 National and Local Elections pursuant to Rule 65 of the 2010 PET Rules."

13. During the Preliminary Conference, it is notable that protestant Marcos reiterated that he has two (2) causes of action:

"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."⁸

14. At the termination of the Preliminary Conference, the Honorable Tribunal issued a **Resolution dated 29 August 2017**.

15. Under the said Resolution, the Honorable Tribunal resolved to defer any action on the Motion for Technical Examination filed by protestant Marcos pending the initial

⁸ A copy of the Transcript of Stenographic Notes is hereto attached as **Annex "3"** and made an integral part hereof.

determination under Rule 65 of the 2010 Rules of the Presidential Electoral Tribunal:⁹

"On the other hand, in protestant's Motion for Technical Examination, protestant prays that the Tribunal direct the conduct of technical examination to be done by handwriting experts of the COMELEC of the voter's signatures appearing on the EDCVL as against the voters' signatures appearing on the VRRs in each of the 2,756 clustered precincts of Lanao del Sur, Maguindanao and Basilan.

Similar to her Comment and Opposition to the Motion for Retrieval, protestee argued in her Comment and Opposition to the Motion for Technical Examination, that protestant is not entitled to the technical examination of the signatures of voters in Lanao del Sur, Maguindanao and Basilan as these provinces are not among those protestant designated as his pilot provinces. Protestee also argued that the pending incidents and logistical and practical considerations as discussed during the Preliminary Conference warrant the denial of the Motion for Technical Examination.

The Tribunal has already resolved protestee's Motion for Reconsideration above; thus, the Motions for Decryption, Retrieval and Technical Examination can already be resolved.

Rule 65 of the 2010 PET Rules, as its caption states, is for the initial determination of the grounds for the protests. Following this, the revision and reception of evidence, upon

⁹ Pages 29-30, Resolution dated 29 August 2017.

designation of the provinces best exemplifying the frauds or irregularities, will begin with those provinces, thus:

INITIAL DETERMINATION OF THE GROUNDS FOR PROTEST

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, and 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.

Rule 65 provides the Tribunal with a litmus test for protestant's grounds as raised in his Protest. Thus, protestant is given the opportunity to designate three provinces **which best exemplify** the frauds or irregularities raised in his Protest. **These provinces constitute "test cases" by which the Tribunal will make a determination as to whether it would proceed with the Protest – that is, retrieve and revise the ballots for all the remaining protested clustered**

precincts – or simply dismiss the Protest for failure of the protestant to make out his case.” [Emphasis supplied]

16. Apparently realizing the imminent demise of his Election Protest, on **12 December 2018**, protestant Marcos once more sought the technical examination of the signatures and thumbmarks in the EDCVL used in the Provinces of Lanao del Sur, Maguindanao and Basilan during the 09 May 2016 National and Local Elections.

16.1. Under the guise of an Extremely Urgent Manifestation of Grave Concern with Omnibus Motion, protestant Marcos alleged a total of **Forty Thousand Five Hundred Twenty Eight (40,528) signatures and Three Thousand Two Hundred Ninety Five (3,295) thumbmarks are not identical.**

16.2. In support thereof, protestant Marcos attached a copy of Summary of the Dactyloscopic and Questioned Document Reports in the case entitled *Abdusakur M. Tan v. Mujiv S. Hataman* docketed as EPC No. 2016-37.

16.3. For the first time, protestant Marcos desperately argued that his *Second and Third Causes of Action are separate, distinct and independent causes of action.*¹⁰

17. The Honorable Tribunal, in the **Resolution dated 02 July 2019**, resolved to once more defer action on the *Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated December 10, 2018 and Consolidated Reply with Urgent Motion to Resolve Protestant's Omnibus Motion dated March 22, 2019 until after the Tribunal's initial determination of the grounds for the Protest under Rule 65 of the 2010 PET Rules:*

¹⁰ Paragraph 8, Consolidated Reply dated 22 March 2019.

"The Tribunal believes, and so holds, that protestant's motions with respect to the conduct of technical examination on his third cause of action are premature because the proceedings under Rule 65 of the 2010 PET Rules have not been concluded. To recall, protestant chose three pilot provinces and prayed for the judicial recount and revision of the ballots. As both protestant and protestee are aware, the Tribunal is currently in the process of appreciation of more than two million revised ballots, which includes ruling on the objections and claims thereto.

Rule 65 of the 2010 PET Rules refers to the initial determination of the grounds for an election protest before the Tribunal. The rule states:

INITIAL DETERMINATION OF THE GROUNDS FOR PROTEST

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, and 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.

Protestant designated Camarines Sur, Negros Oriental, and Iloilo as his pilot provinces which, under the language of Rule 65, best exemplify the frauds or irregularities alleged in the election protest. As it stands, therefore, it would be premature to conduct a technical examination of voter's records and election documents from provinces other than those designated as pilot provinces in the Protest.

The Tribunal reiterates its previous ruling in its Resolution dated August 29, 2017 on the deferment of the technical examination. **Rule 65 allows the Tribunal to conduct a revision of ballots and reception of evidence on the designated pilot provinces first, and on such basis, dismiss the protest if it finds that the protestant will most probably fail to make out his case.** Practical and logistical considerations also restrict the Tribunal in proceeding with the technical examination due to its limited resources and manpower, as the Tribunal is faced with the gargantuan task of determining the validity of the votes in more than two million ballots from the pilot provinces.

Given the foregoing, the Court resolves to defer action on the matter of technical examination until such time that an initial determination has been made on the protest, based on the explicit mandate of Rule 65 of the 2010 PET Rules. On that note, there is no need to discuss at this time the issue of the application of the *sub judice* rule to this case." [Emphasis supplied.]

18. Clearly, the issue on whether the above-captioned Election Protest can proceed will hinge on whether protestant Marcos was able to show substantial recovery in his pilot precincts.

19. On the other hand, recent reports from various media outlets have been on how the members of the Honorable Tribunal will vote on the result of the revision, recount and re-appreciation of ballots from the pilot provinces.¹¹

20. Worse, other reports have mentioned that, notwithstanding that protestant Marcos failed to show any substantial recovery in his pilot provinces, the Honorable Tribunal will proceed to the alleged Third Cause of Action.¹²

21. Meanwhile, no less than protestant Marcos acknowledged that should he fail to show reasonable recovery in his pilot provinces, the above-captioned Election Protest will be dismissed:

"ATTY. GARCIA:

Perhaps, Your Honor, that's the reason why, if I may and with all due respect, the Honorable Presidential Electoral Tribunal revise(d) its own rules

¹¹ <https://www.philstar.com/opinion/2019/10/03/1957002/opinion-its-8-6-marcos-pet-first-round#oBXIGi2UuUYOsjQ3.99>;
<https://www.manilatimes.net/2019/10/09/news/headlines/sc-postpones-voting-on-poll-case-vs-leni/628476/>;
<https://www.manilatimes.net/2019/10/08/news/headlines/sc-to-junk-ruling-favoring-robredo/627957/>

¹² <https://www.sunstar.com.ph/article/1824751>

and include the three (3) pilot provinces are concerned. That was likewise the same provision added by the Senate Electoral Tribunal and the HRET, even by the COMELEC. There are now pilot areas precincts in the HRET, SET and the COMELEC, provinces in the case of PET, because if we are all to open the three provinces and the Honorable Tribunal will find or will be able to find out that there is no difference between the results as appearing in the certificates of canvass or votes in the election returns as against the manually counted in the revised ballots, again, it's up to the Honorable Tribunal whether to proceed with the remaining protest or to dismiss the protest."¹³

22. Noteworthy that protestant Marcos acknowledged that Rule 65 of the 2010 Rules of the Presidential Electoral Tribunal is not unique.

23. Rule 76 of the 2013 Rules of the Senate Electoral Tribunal mandates the dismissal of an election protest should it be determined that the official results will not be affected after the revision of the pilot precincts:

"Rule 76. Pilot Precincts; Initial Determination. – The revision of the ballots or the correction of manifest errors and reception of evidence shall begin with pilot precincts. If after the appreciation of ballots or election documents and/or reception of evidence in the pilot precincts, the Tribunal determines that the officially proclaimed results of the contested election will not be affected, the Tribunal shall dismiss the protest, counter or cross protest without further proceedings." [Emphasis supplied.]

¹³ Pages 34-35, TSN dated 11 July 2017.

24. Further, **Rule 40 of the 2015 Revised Rules of the House of Representatives Electoral Tribunal** similarly provide that, should there be **no reasonable recovery** made after the revision, recount and re-appreciation of the pilot precincts, the election protest will be dismissed:

"Post-Revision Determination of the Merit or Legitimacy of Protest Prior to Revision of Counter-Protest; Pilot Precincts; Initial Revision and/or Technical Examination. – Any provision of these Rules to the contrary notwithstanding, as soon as the issues in any contest before the Tribunal have been joined, the protestant and the protestee shall be required to state and designate in the preliminary conference brief, at most twenty-five (25%) percent of the total number of precincts involved in the protest or counter-protest, as the case may be, which said parties deem as best exemplifying or demonstrating the electoral irregularities or fraud pleaded by them.

The revision of the ballots or the examination, verification or re-tabulation of election returns and the reception of evidence in the remaining seventy-five (75%) protested precincts and twenty-five percent (25%) counter-protested precincts shall not commence until the Tribunal shall have determined through appreciation of ballots or election documents and/or reception of evidence, within a period not exceeding ten (10) successive working days, the merit or legitimacy of the protest, relative to the designated pilot protested precincts.

Based on the results of such post-revision determination, the Tribunal may dismiss the protest without further proceedings, if and when no reasonable recovery was established from the pilot protested

precincts, or may proceed with the revision of the ballots or the examination, verification or re-tabulation of election returns in the remaining contested precincts.

The foregoing shall likewise apply to the twenty-five percent (25%) of designated pilot counter-protested precincts.

However, if the proclamation margin is only one thousand (1,000) votes or less, the revision of ballots or the examination, verification or re-tabulation of election returns and/or reception of evidence shall cover all the contested precincts."

25. Finally, **COMELEC Resolution No. 9720**¹⁴ which provides for the Conduct of Recount before the Commission on Elections:

"(b) The recount of the ballots in the remaining contested precincts shall not commence until the Division concerned shall have made a determination on the merit of the protest based on the results of the recount of the votes on the ballots from the pilot protested precincts and the review of other documentary exhibits which the protestant may submit. The documentary exhibits may be submitted by the protestant within a non-extendible period of ten (10) days from the completion of the recount of the pilot protested precincts.

Based on the above determination, the Division may dismiss the protest, without further proceedings, if no reasonable recovery could be established from the pilot protested precincts. Otherwise, the recount of the ballots in the remaining protested precincts shall proceed. The recount of the pilot

¹⁴ In the Matter of Amending Rules 2, 6, 8, 13 and 15 of COMELEC Resolution No. 8804 as amended by COMELEC Resolution No. 9164.

counter-protested precincts, if any, and of the remaining counter-protested precincts if substantial recovery is likewise established by the counter protestant, shall then follow. For this purpose, **there is substantial recovery when the protestant or counter protestant is able to recover at least 20% of the overall vote lead of the protestee or counter-protestee.**

However, the above-mentioned procedure shall not be applicable in case the protestant avails the option of reading/appreciation of the rejected ballots only pertaining to the entire protested or counter-protested precincts under Section 4 (e) of Rule 13."¹⁵ [Emphasis and underscoring supplied.]

26. Based on Rule 65 of the 2010 Rules of the Presidential Electoral Tribunal, the above-captioned Election Protest will rise and fall on the pilot provinces chosen by protestant Marcos.

27. In plain terms, should protestant Marcos fail to make any substantial recovery in his pilot provinces, the above-captioned Election Protest will be dismissed.

28. Surprisingly, notwithstanding the clear language of Rule 65 of the 2010 Rules of the Presidential Electoral Tribunal, rumors abound on the Honorable Tribunal proceeding to the Third Cause of Action despite an alleged finding that protestant Marcos has not made any substantial recovery.

29. What is more amazing is the undue reliance of protestant Marcos on the alleged Dactyloscopic and Questioned Document Reports in the case entitled *Abdusakur M. Tan v. Mujiv S. Hataman* docketed as EPC No. 2016-37.

30. Protestant Marcos has misled the Honorable Tribunal.

¹⁵ Rule 15, Section 6 (b) of COMELEC Resolution No. 9720.

31. The alleged findings of the Dactyloscopic and Questioned Document Reports pertains to:

31.1. Five Hundred Eight (508) established precincts; and,

31.2. A comparison/examination of a total of **Eighty Two Thousand Three Hundred Sixteen (82,316) registered voters.**

32. Meanwhile, based on the records, the Provinces of Lanao del Sur, Maguindanao and Basilan has a total of **Two Thousand Seven Hundred Fifty Six (2,756) clustered/merged precincts.**

33. Further, based on the Provincial Certificate of Canvass, the Provinces of Lanao del Sur, Maguindanao and Basilan have a total of **One Million Three Hundred Fifty Four Thousand Nine Hundred Twenty (1,354,920) registered voters:**

| Province | Registered Voters |
|---------------|-------------------|
| Lanao del Sur | 484,435 |
| Maguindanao | 634,323 |
| Basilan | 236,050 |
| TOTAL | 1,354,920 |

34. Thus, it is misleading for protestant Marcos to claim that the **Eighty Two Thousand Three Hundred Sixteen (82,316) registered voters**, of which only **Forty Three Thousand Eight Hundred Twenty Three (43,823)** were allegedly found not to have identical signatures/thumbmarks be representative of **One Million Three Hundred Fifty Four Thousand Nine Hundred Twenty (1,354,920) registered voters.**

35. In summary, protestee Robredo still has the highest respect to the Honorable Tribunal that the Rules will not be changed in the middle of the game, so to speak.

RESPECTFULLY SUBMITTED.

Pasig City for Manila. 14 October 2019.

ATTY. ROMULO B. MACALINTAL

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IBP Lifetime No. 0724

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By

MARIA BERNADETTE V. SARDILLO

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MCLE Compliance No. VI-0018414/06 February 2019

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EXPLANATION

Due to unavailability of messengers and the distance of the parties, copies of the herein "*Manifestation*" 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 ENDIC-GUAN**, hereby declare that the Manifestation submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and are true copies of the Manifestation filed with the Presidential Electoral Tribunal.

Pasig City. 14 October 2019.

Lamen
LAILA ENDIC-GUAN
Secretary

Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 14th day of October 2019, by affiant **LAILA ENDIC-GUAN** who is personally known to me, and appeared with her UMID with no. 0111-3021584-5 issued by the 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. 22 ;
Page No. 6 ;
Book No. 1 ;
Series of 2019.

Maria Cynthia Antonia V. Sardillo Pimentel
MARIA CYNTHIA ANTONIA V. SARDILLO-PIMENTEL
NOTARY PUBLIC FOR PASIG CITY, PATEROS AND SAN JUAN
Until December 31, 2020
Appointment No. 212 (2019-2020)
Roll No. 47275
IBP No. 063779/RSM/07 January 2019
PTR No. 5174612/Pasig City/08 January 2019
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