

REPUBLIC OF THE PHILIPPINES )

\_\_\_\_\_ ) S.S.

**AFFIDAVIT**

*In all I do, I will have to face my Creator to whom I owe my life and my being. In the depths of my nothingness, His Holy Word beckoned me to make a clean breast of everything - "THE TRUTH WILL SET YOU FREE".*

I, **JANET LIM NAPOLES**, Filipino, of legal age and presently confined at the Ospital ng Makati, after having been duly sworn to in accordance with law, hereby depose and state that:

1. I am one of the Respondents in OMB-C-C-13-0396, OMB-C-C-13-0318, OMB-C-C-13-0395, OMB-C-C-13-0316, OMB C-C-13-0397, OMB-C-C-13-0313, OMB-C-C-13-0314, OMB-C-C-13-0317, OMB-C-C-13-0319, OMB-C-C-0315, OMB-C-C-13-0320, OMB-C-C-14-0003, OMB-C-C-14-0018, OMB-C-C-14-0015, OMB-C-C-14-0017, OMB-C-C-14-0007, OMB-C-C-13-0357 and my all other cases pending before the Office of the Ombudsman; for violation of R.A. No. 7080, as amended (otherwise known as the Anti-Plunder Act), for violation of R.A. No. 3019 as amended (otherwise known as Anti-graft and Corrupt Practices Act) and for violation of Art. 172 of the Revised Penal Code.

2. I am executing this affidavit to shed light on the facts and circumstances surrounding the alleged Priority Development Allocation Fund (PDAF) and Malampaya Fund scams. This affidavit will also touch on the use of government funds like in the form of budget insertions and those coursed through the Department of Transportation and Communication (DOTC) and other transactions that I have personal knowledge of, but the details of which will be covered by another affidavit.



3. I am likewise presenting this affidavit to support my request for the exclusion of my children **James Christopher Lim Napoles** and **Jo Christine Napoles** from the above mentioned Complaints. My children had no knowledge, participation and involvement whatsoever in the subject cases. They had executed counter-affidavits to prove their innocence in the charges made against them.

4. We are also willing to help the government by offering to testify, based on our personal knowledge and information, in all other cases that the Department of Justice and the Office of the Ombudsman may file against those involved in the above mentioned transactions.

5. During the Senate Inquiry in November 2013, I opted to remain silent because at that time, I was still at a loss on what to do. Since, I did not have a counsel of my choice at the Senate, I was then assisted by a lawyer from the Public Attorneys' Office (PAO) whom I just met during the said inquiry. I wanted to talk to the Secretary of the Department of Justice, Leila De Lima, prior to my testimony in the Senate but various forces prevented me from doing so. Thus, my silence in the Senate Inquiry.

6. I became so careful in my dealings with other people because oftentimes, I found them just fishing for information for their personal agenda. Sometimes, people would come to us offering for help but ended up extorting huge amount of money. At various instances, there seem to be forces who want to make me a "scapegoat" of the scams uncovered by the COA, and divert public outrage towards me.

7. Since the hospitalization of my brother Reynald Lim y Luy and the filing of the Serious Illegal Detention case against him and myself in March 2013, my family and I started receiving threats from unknown sources through text messages using prepaid cellular phone numbers and anonymous letters. Our personal information (telephone numbers and email addresses) were posted on-line encouraging our detractors to harm or threat

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us. In fact, unmarked vehicles and unidentified persons were doing surveillance work at our house and office, as well as in the residence of our relatives.

8. While I was being detained at Fort Sto. Domingo, and with the spiritual guidance of Archbishop Socrates Villegas, D.D. and the other priests who patiently and unceasingly pray and continued praying for me to tell the truth, I realized that indeed I should TELL THE WHOLE TRUTH.

9. By telling the truth, which the people have been clamoring and I have been wanting to do for a long time, I intend to help my country and work towards minimizing, if not totally eradicating corruption, so as not to put to waste these revelations.

10. Before undergoing surgery, God answered my prayer by giving me the chance to talk to the Honorable Secretary of Justice, Leila De Lima. And this bolstered my belief that indeed, TELLING THE TRUTH will set me free.

11. Thus, I am executing this affidavit.

***I AM NOT THE MOST GUILTY AND NOT THE  
"MASTERMIND" OF THE ALLEGED 10 BILLION  
PORK BARREL SCAM NOR OF THE MALAMPAYA  
FUND SCAM***

12. I categorically and strongly DENY that I am the "mastermind" of the alleged Priority Development Assistance Fund (PDAF) or Pork Barrel and Malampaya Fund scams as well as other projects that used government funds of which I have personal knowledge of.

13. First and foremost, I am not capable and do not have the "skill" to run such a complicated scheme given my humble beginning. I am only an ordinary private businesswoman. I neither have the power nor the authority to order the Department of Budget and Management (DBM) to release documents as well as command the implementing agencies to choose any

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foundation or Non-governmental Organization (NGO). Neither can I direct nor control any legislator to give me his or her PDAF and disburse it as I please. I also did not conceptualize the formation of NGOs as well as their functions. I am not and was never an elected official nor an accountable government officer or employee.

14. Second, the Priority Development Allocation Fund (PDAF) existed even as early as 1922. I was not even born then nor my parents. In 1922, it was named as the Public Works Act. Even as early as 1925, the misuse of the funds in the form of pork barrel was already questioned. The PDAF, as known today, evolved from Mindanao Development Fund and Visayas Development Fund in 1989, Countrywide Development Fund in 1990, then Congress Initiative Allocation before it was called the PDAF which we refer to today. Though it changed names over the years, the function and use of the said fund have remained the same.

15. Third, the Commission on Audit (COA) Report identifies at least 82 NGOs with anomalous or questionable transactions for just the years 2007-2009. I am not involved nor familiar *with all* of these NGOs. I did not create nor form all these NGOs such that one can conclude that I was the "brain" of using pork barrel or foundations in transacting with the government. I am absolutely sure that even before I entered into the business of transacting through NGOs or foundations, there were already existing foundations transacting with the government.

### ***General Background of the Transactions***

16. In my many years of being a businesswoman, I engaged in various businesses. In one of my ventures, I was the exclusive distributor of Nutrigrowth Philippines—a manufacturer of Liquid Foliar Fertilizers. After a few years, I was able to buy Nutrigrowth Philippines and became a

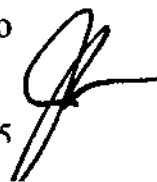


manufacturer of fertilizers. Later on, I decided to form Dragon 1.5 Mega Philippines after Nutrigrowth encountered some problems.

17. Around 2000, I was introduced to then Congressman Florencio Abad by Mr. Manuel Jarmin. We met at the Japanese Restaurant in Edsa Shangri-la Plaza Hotel. In that meeting, he told me about a project worth 10 million pesos. He showed me the Special Allotment Release Order (SARO) then explained to me what it was for. Before the meeting ended, I handed him Php 2 Million Pesos. When the Notice of Cash Allocation (NCA) was released, I gave him another Php 2 Million Pesos. Afterwards, when we talked about the implementation, he asked me if I had an NGO. When I told him I did not have an NGO, he told me he would take care of it. From what I recall, he used Batanes Electric Cooperative to implement the project. After some time, he returned the Php 4 Million Pesos I gave him with an added Php 2 Million Pesos more. That is when I started to transact using the PDAF.

18. I wanted to expand my business as well as the distribution of my goods just like any other businesswoman. To my confusion and surprise, the agencies did not transact directly with companies. Instead, they had various NGOs/Foundations at their control and disposal, which they offered for rent. Dennis Cunanan was one of those who offered various NGOs for rent, which can be used to implement projects in TLRC. However, I feared that these NGOs that they rented out had problems as I heard that the incorporators they use are either dead or not existing.

19. *NGOs*— Due to my fear, I wanted to make sure that the NGOs I will associate with legally complied with the laws including SEC as well as BIR requirements. That's why as far as I know, the NGOs I am associated with strictly complied with the registration and other requirements of the law. In addition to that, the agencies have strict rules and regulation as to the accreditation of NGOs before they enter into Memorandum of Agreement (MOA) with it. Thus, before an NGO can transact, the agency will have to

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inspect and accredit the said NGO. For such reasons, as far as I know the NGOs I am associated with are legal and not bogus as alleged and highly publicized.

20. **The agents**— Since I have no capacity to know the projects of the agencies as well as the funding of the legislators, different agents representing the legislators approach me and offer various projects. The agents are Ruby Tuazon, Maya Santos, Patricia Gay Tan, Jen Corpuz and Allan Ruste among others. As agents they receive an estimate of 5-10% of the total project cost as their commission. The primary role of the agents is to follow up the agencies and legislators for the processing of the documents as well as the release of the funds. Some of the agents are named below:

- a. **Ruby Tuazon**— I was introduced to Ruby Tuazon by his husband, Carlos Tuazon. She has a lot of contacts in the government because she used to be the Social Secretary of then President Estrada. Since then she would offer projects to me. Usually, she receives 10% to 15% commission.
- b. **ASEC Catherine May C. Santos**—I was introduced to Maya Santos when she went to my office together with her boyfriend from customs named Jerry Cailan. She introduced herself as the chief of staff of Senator Manny Villar. She initially offered the PDAF of Senator Legarda. She usually asks for 10% commission while 40% will be given to the Senator she talked to. When she became the director of admin and finance of the Department of Agriculture, she offered more projects to me. She was very influential in the agencies because she was known there thus she was the one who would always follow up with the agencies. She would always boast about her connections as she is also married to Ino Santos who is the son of then mayor of Davao and sister-in-law of Bebot Bello, the former D.O.J. Secretary and Justice Antonio Nachura.

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She usually gets her commission in cash. Though, at one time, I remember depositing 5 Million pesos in her Metrobank Jose Abad Santos account. It was during her tenure as the director at the Department of Agrarian Reform when she was able to send her daughter to school in London. She was also able to purchase a lot of vehicles and a newly constructed house in AFPOVAI where she currently lives in.

c. **Patricia Gay Tan** —I was introduced to Patricia Gay Tan Alice Villanueva and Lourdes “Baby” Villanueva Reyes. She is the sister of Bibing Villacorta and their brother Atty. Yaki Tan (former PLLO), She is also the daughter of then Congresswoman Agana of Bohol. She offered PDAF projects and sold it to me. According to her, she has been engaged in projects using PDAF funds for a long time. Later on, I found out that she would always enter into projects that would turn out to have problems. I also found out that she would use the NGOs associated with me, so I would be the one to have problems. During the first time they offered to transact, they showed me a SARO. However, the SARO turned out to be fake when I had it verified. At one time, she also offered a one (1) Billion worth project coursed through DOTC using First Allied United Enterprises. Luckily, I never pushed through because after sometime I found out that they proceeded with the project with so many irregularities. She was also associated with ZNAC Rubber Estate Corporation and Pangkabuhayan Foundation. I remember that in the case of ZNAC Rubber Estate, COA found out that using Pangkabuhayan Foundation and there was no delivery.

d. **Pauline Labayen**—She is the chief of staff of Senator Jinggoy Estrada. As the chief of staff of the Senator, the agents would always follow up with her regarding the documentations. Eventually, she also

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became the agent herself. She usually gets 5%-10% commission in the transactions. She is also the owner of tips and toes in Greenhills.

- e. **Jennifer Corpuz**—She was introduced by Pauline Labayen. She used to work for Jinggoy Estrada then formed a PR firm at Ortigas. She is the PR of Senator Sotto. Usually, she gets 10% commission.

21. **Legislators**—The agent negotiates the rebate of the legislators as they have agreed or the legislator would directly demand how much their share should be. Whenever I am not amenable with their demands, they would offer the project to someone else. Therefore, the rebate depends on the amount the legislator or the agent would demand. I really have no say as to the amount, since if I don't agree, they would just offer the project to someone else. The rebate used to be just 20%, which later on became 30% until 50% depending on what they demand. Aside from that, the legislator chooses which agency the funds will be coursed through.

22. **Agency**— The legislator chooses which NGO he chooses to partner with to implement the project as shown by the endorsement letter that they submit to the agency. The agency will not recognize the NGO unless the legislator endorses them. The agency enters into a Memorandum of Agreement (MOA) with the NGO and the legislator as to the project. The agency verifies, inspects and accredits the NGO before they do so to make sure that the said organization is legal and existing and compliant to the agency's requirements and guidelines. The check is also released via the agency's cashier after the proper liquidation papers are approved and submitted. Some agency requires a 3%-5% management fee as per the agency rules.

- a. **National Agri Business Corporation (NABCOR)** - Rhoda Mendoza (owner of Cams Tres Marias, which sells organic fertilizer operating at Sta. Maria Bulacan), Allan Javellana
- b. **Technology and Resource Center (TRC/TLRC)** – Antonio Ortiz, Dennis Cunanan

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c. **National Livelihood and Development Corporation (NLDC) -**  
Alexis Sevilla

23. ***Rebate/Commission given based on release of documents—***

The giving of the rebate of the legislator and commission of agent depends on the whim of the agent and the legislator. When the agents or legislators approach me, they usually show me a photocopy of the SARO or listing. At that point, the rebate of the legislator and the agent is given either in partial or in full. The photocopy of the SARO or listing shows that the project exists. When the original of the SARO is released by the DBM, sometimes rebate is also given to the legislator when we are given a copy of the SARO. In some cases, upon release of the Notice of Cash Allocation by DBM rebate is also given. Rebate is sometimes given when the final check is released by the agency.

24. ***Release of Government Funds—*** The MOA is entered into between the agency, legislator and NGO. The agency releases the fund appropriated for the project upon submission of the required documents. The funds are released in various tranches. Initially, fifteen (15%) of the fund, the mobilization fund, is released so that the NGO will be able to implement the project. During the implementation of the project, the agency representative accompanies the NGO representative to make sure the delivery/implementation is made. They monitor the delivery and implementation. The beneficiary of the project will be provided by the Local Government Unit (LGU), since the delivery is done to their constituents. Once the project is implemented and delivered, liquidation papers will be required by the agency, which the NGO complies with. In every delivery/implementation, the inspector will give the approval if the funds should be released depending on the report. Only when the agency approves the liquidation papers submitted will they release the appropriate check for 35% or 85% of the project cost. If only 35% of the fund is initially released, the 50% of the budget will be released only upon submission of a terminal report restating the delivery and implementation of the project. All the forms

and documents submitted to the agency are also provided by the agency and only filled up according to the details of the project as implemented.

25. **Post- Audit**— Only after the fund is released and the project is implemented will the COA conduct the audit.

26. **Computation of Expenses**—The table below shows the usual costing breakdown of the project, depending on the negotiation:

<b>Legislator</b>	40%-50%
<b>Agent</b>	5%- 10%
<b>Agency</b>	2%-15%
<b>Production Cost</b>	20%-35%
<b>Profit and Operation Expenses</b>	5%-10%

As a businesswoman, the venture was profitable since I get to keep 3% to 10% of the total project appropriation, which is shared with the NGO presidents and operation costs. To assure that we get to comply with the demands of the trade, we procure quality goods and services at a reasonable price. Thus, even if our production cost is limited to 20%-35% we are able to comply with the project requirements without sacrificing standards and quality. We also aim for volume so even if the profit is small, I still find it good business. In some cases, the project is breakeven. In some cases, I don't get to collect and earn from the project. Those are just part of the risk of being a businesswoman.

### **THE TRUTH ABOUT THE MALAMPAYA FUND**

(OMB-C-C-13-0357, NBI vs. GLORIA MACAPAGAL ARROYO)

27. Sometime in 2004, Tet De Joya, Manager of Gentleman's Club located at the 40<sup>th</sup> Floor of Discovery Suites, went to my office at the 25<sup>th</sup> Floor of Discovery Suites together with Carlos "Butch" Tuason. Ms. De



Joya introduced me to Mr. Tuason as the cousin of then First Gentleman "FG" Arroyo. They asked me to help them, through my staff, to fix the car of Mr. Tuason, which was then parked at the basement parking. During our meeting, Mr. Tuason told me that he was in-charge of the projects as well as the PDAF of then Cong. Iggy Arroyo, brother of FG Arroyo.

28. Few days after, I was invited by Mr. Tuason to the house of Marilou Arroyo, sister of FG Arroyo, at the La Vista Subdivision in Quezon City. At that time, the house of Cong. Iggy Arroyo also in La Vista Subdivision was being constructed.

29. After the construction of Cong. Iggy Arroyo's house, I was again invited by Mr. Tuason to La Vista Subdivision. This time I was introduced to Congressman Arroyo.

30. Mr. Tuason told me that he had a second wife named Ruby Chan Tuason. At that time, they were in trouble because he was unable to provide her monthly financial support for months. I did not believe him initially that he had financial problem with his wife Ruby Chan Tuason, because I knew him to be the cousin of FG and they came from a well-known wealthy family. Thereafter, he introduced me to Ruby Chan Tuason at the latter's house in Bel-Air, Makati. While in Bel-Air, they fought on financial matter even in my presence.

31. Mr. Tuason then asked Ruby to give me government projects to be sourced from the PDAF. He likewise asked Ruby to share him in the rebate which I would give.

32. Ruby then told me that she had lots of contacts in the government because she used to be the Social Secretary of President Estrada and also because she is the wife of FG Arroyo's cousin. At that time, the president was FG's wife, Gloria Macapagal Arroyo.

33. Ruby mentioned to me that she also refers to Bobby Rodriguez of Pangasinan some hard projects sourced from the PDAFs of some senators and congressmen.

34. After that brief meeting with Ruby at her house, she and Mr. Tuason went to my office in Discovery Suites offering to me the PDAFs of some senators and congressmen.

35. Thus, it was in 2004 that Ruby started to refer to me the PDAFs of lawmakers of which she asked to be paid 10% rebate, aside from the rebate being promised and given to her by the lawmakers, because that was also the percentage that she receives from Bobby Rodriguez. She mentioned the names of Patricia Agana Tan and Alice Navales Villanueva. She told me that the foundations they were using had problems, so she had to refer some of her projects to me.

36. I had several projects with Ruby involving the PDAFs of various lawmakers.

37. It was around November 2009, when Ruby showed me the list of government funds amounting to Php 25 Billion from Malacanang. She was then talking to a certain Medy Poblador while explaining at the same time the list of government funds. I saw in the list the Php 5 Billion Pesos project in the Department of Agriculture (DA), but she said she already referred it to another contractor.

38. Ruby then referred to me the Php 900 Million Pesos government fund, which will be coursed through the DAR. She handed over to me the SARO dated November 19, 2009. I was then reluctant to accept the offer considering the huge amount, but she told me her "boss" named "RR" is a Little DBM.



39. She also told me that the funds will be released immediately because it would be used for the 2010 Presidential Election of then President Gloria Macapagal Arroyo's political party. She likewise said that she was in-charge of the TV advertisements of the Lakas Party. She asked me to send my staff to the DAR office and to call her should there be any problem in DAR so she could call Medy Poblador to fix the problem.

40. At that time, I did not know that the Php 900 Million Pesos fund was the Malampaya Fund. Even on recollection now, I don't think I was directly informed that the project will be utilizing the Malampaya Fund. We agreed that 60% rebate or Php 540 Million Pesos would go to her, 35% would be set aside for the purchase of goods to be delivered and 5% would be left for the foundation. Again, she said that the money would be used for the 2010 election.

41. In that computation, the foundation would get 5 % from the Php 900 Million Pesos or Php 45 Million Pesos.

42. I agreed to the proposed 60% rebate, considering our arrangements for the said project. She said, she would choose the LGU that they wanted to use since it will be election. She also took the responsibility of processing the documents and asking the signatories to sign documents which the DAR may require. My responsibility would be limited to the delivery of the goods of the LGU/End User. I only requested her to choose LGUs from nearby towns and provinces to make sure delivery would be easy.

43. When the documentation process was started, Ruby Tuason insisted to submit documents even if it is still incomplete and to just submit additional documents later. She told me not to worry because according to her Malacanang already instructed the DAR to speed up the release of the check.

44. When the check was released by the DAR, I asked Ruby about the implementation of the delivery. Ruby Tuason was the one who provided me the list of the ninety seven (97) mayors and their respective municipalities.

45. I also asked Ruby who would pick up the 60% or Php 540 Million Pesos, she told me to bring the money to her house in Zagu St., Dasmarinas Village, Makati City which she was then renting.

46. When the money was delivered to Ruby, I asked her the names of the coordinators in order to arrange the delivery of the goods. But she said she would just get back to me. Few days later, Ruby went to my office asking for the 35% or Php 315 Million originally intended for the purchase of the goods to be delivered to the beneficiaries. She told me that the deliveries should be made in cash instead of goods to the Mayors because they wanted funds for their election campaign.

47. At first, I refused to release the said amount because I already used part of the money to pay the raw materials needed for the delivery. Ruby insisted and told me that the end users would not accept the goods even if I insist to deliver. I felt trapped at that time because if I don't give in to her request, I won't be able to comply with the liquidation requirements. Thus, I was forced to hand her the 35% because I did not want to have problems later on. After delivering the money, she gave me the beneficiary list for the project.

48. During the transaction, whenever I requested Ruby to follow up about the documentation of the project, I often hear her talking to a certain Medy Poblador to follow-up.

49. Around the period of the Php 900 Million Malamapaya Fund project, Ruby was able to build a Three Hundred Million Pesos (Php



300,000,000.00) worth house in Dasmarinas, Village along Mahogany Street.

### THE TRUTH ABOUT THE FILED CASES

In **OMB-C-C-13-0396** (FIO vs. Juan Ponce Enrile, et.al.) and **OMB-C-C-13-0318** (NBI vs. Juan Ponce Enrile, et.al.), the following transactions occurred with the Office of Senator Juan Ponce Enrile ("Sen. Enrile"):

50. In **SARO # 07-04618**, the amount is Twenty Million Pesos (Php 20,000,000.00) the agency is TLRC.

51. The computation of commission herein provided, to wit:

	Percentage	Amount
<b>Juan Ponce Enrile</b>	45% less tax	Php 8, 640,000.00
<b>Ruby Tuazon</b>	10% less tax	Php 1,920,000.00
<b>Antonio Ortiz</b>	10% less tax	Php 1,920,000.00
<b>Dennis Cunanan</b>	5% less tax	Php 960,000.00

52. The advanced payments given to Sen. Enrile and Ruby were made upon listing. The commission of Sen. Enrile and Ruby were picked up by Ruby in my office in the Discovery Suites (Unit 2502). I remember she wore a black duster type dress accented with pashmina shoal. I personally handed the cash to Ruby amounting to Ten Million Five Hundred Sixty Thousand Pesos (Php 10,560,000.00). She asked that the cash for the Senator Enrile be placed in a box (Php 8,640,000.00) while her commission be placed in her bag (Php 1,920,000.00).

53. I personally met Director Antonio Ortiz in Pancake House in Malayan Building in Ortigas to give him his commission of One Million Nine Hundred Twenty Thousand (Php 1,920,000.00), he was wearing a long sleeve shirt and brown slacks and came around in a black pickup. Dennis



Cunanan was met by my nephew John Lim at the Ford Showroom in Edsa Greenhills for his commission of Nine Hundred and Sixty Thousand (Php 960,000.00). Both Ortiz and Cunanan's commission were given before they would release the check to the foundation since I was told that they would not release the check unless they will get their commission first.

54. In **SARO # ROCS-08-01347**, the amount is Twenty Five Million Pesos (Php 25,000,000.00) and the agency is DA-NABCOR.

55. The computation of commission is herein provided, to wit:

	<b>Percentage</b>	<b>Amount</b>
<b>Juan Ponce Enrile</b>	40% less tax	Php 10,000,000.00
<b>Ruby Tuazon</b>	15% less tax	Php 3,750,000.00
<b>Allan Javellana</b>	10% less tax	Php 2,500,000.00
<b>Rhoda Mendoza</b>	5% less tax	Php 1,250,000.00

56. Ruby Tuason went to my office and gave me a SARO worth Twenty Five Million Pesos (Php 25,000,000.00) she told me that she will be meeting with her contact in the office of Senator Enrile later in the day and she needs to close this deal to sell the SARO before that. She insisted that I produce the necessary cash so she can relax and not stress about it anymore. She told me that if I decline, she will be meeting with Patricia "Gay" Agana Tan later in the day to convince her to produce the money instead. I checked my finances and was able to come up with the amount. I placed the cash in two separate bags and handed it to her.

57. I sent Rhoda Mendoza and Dir. Allan Javellana's portion to their office thru one of my staff. I placed the cash in two separate paper bags containing Two Million Five Hundred Thousand Pesos (Php 2,500,000.00) for Director Javellana and One Million Two Hundred Fifty Thousand Pesos (Php 1,250,000.00) for Rhoda Mendoza.

58. In SARO # ROCS-09-00804, the amount is Twenty Five Million Pesos (Php 25,000,000.00) and the agency is DA-NABCOR.

59. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 11,250,000.00
Ruby Tuazon	10% less tax	Php 2,500,000.00
Allan Javellana	10% less tax	Php 2,500,000.00
Rhoda Mendoza	5% less tax	Php 1,250,000.00

60. For this transaction I met Ruby Tuason in the lobby of Discovery Suites. She was together with her driver and maid. I placed the entire amount of Thirteen Million Seven Hundred Fifty Thousand in a printer box to make it less conspicuous. I sent the portion of the funds to Director Allan Javellana and Rhoda Mendoza. I instructed one of my staff to meet Rhoda Mendoza in the Starbucks at the Philippine Stock Exchange Building in Ortigas and handed her two paper bags containing One Million Two Hundred Fifty Thousand (Php 1,250,000.00) for Rhoda Mendoza and Two Million Five Hundred Thousand Pesos (Php 2,500,000.00) for Director Javellana. Rhoda Mendoza gave me a call when she received both paper bags.

61. In SARO # ROCS-08-05216, the amount is Fifty Million Pesos (Php 50,000,000.00) and the agency is DA-NABCOR.

62. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 21,825,000.00
Ruby Tuazon	10% less tax	Php 4,850,000.00
Allan Javellana	10% less tax	Php 4,850,000.00
Rhoda Mendoza	5% less tax	Php 2,425,000.00



63. For this particular transaction Ruby gave me a call again. She told me that she was able to acquire a listing under Senator Enrile amounting to Fifty Million Pesos (Php 50,000,000.00). She asked me if I was interested and I said yes. She told me to give her a call once I have gathered the cash for the rebate and commission. After 2 days I gave her a call and said that it was ready for pickup in my office. Ruby sent her driver "Al" to pick it up. I placed Senator Enrile's advance commission in a box amounting to Ten Million Nine Hundred Twelve Thousand and Five Hundred Pesos (Php 10,912,500.00) and Ruby Tuason's in a paper bag containing Two Million Four Hundred Twenty Five Thousand Pesos (Php 2, 425,000.00) and then sealed it before I gave it to Al. I confirmed with Ruby by giving her a call that "Al" received the sealed box and paper bag before I sent him off. Upon release of the SARO, Ruby asked me if I can bring the balance of the commission in her house in 1857 Sagu St. Dasmarinias Village, Makati. I handed Ruby a sealed box with Senator Enrile's commission amounting to Ten Million Nine Hundred Twelve Thousand and Five Hundred Pesos (Php 10,912,500.00) and Ruby Tuason's in a paper bag containing Two Million Four Hundred Twenty Five Thousand Pesos (Php 2,425,000.00). She excused herself and placed the box and paper bag in her room and came back to have snacks with me.

64. I gave the commissions of Allan Javellana and Rhoda Mendoza, both of NABCOR, personally in my office in 2502 Discovery Suites upon clearing of the check that NABCOR issued to the foundation. Rhoda was wearing the usual office attire and we talked about where she and her family lived. She had a hard time figuring out how to take the cash back to her office but later on found someone to pick her up from my office lobby. I gave her two paper bags, one was for Dir. Allan Javellana containing Four Million Eight Hundred Fifty Thousand (Php 4,850,000.00) and another for her amounting to Two Million Four Hundred and Twenty Five Thousand (Php 2,425,000.00).



65. In SARO # ROCS-08-07211, the amount is Fifty Million Pesos (Php 50,000,000.00); the agency is DA-NABCOR.

66. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 21,825,000.00
Ruby Tuazon	10% less tax	Php 4,850,000.00
Allan Javellana	10% less tax	Php 4,850,000.00
Rhoda Mendoza	5% less tax	Php 2,425,000.00

67. The advance commission was picked up by Ruby Tuason in my unit at Pacific Plaza. We had small talk over lunch, I even gave her three (3) pieces of blouses that I got from Japan because she liked the same one that I was wearing that day. I showed her the cash and we counted it in my bedroom and I placed Senator Enrile's cash in a colorful duffel bag (Ten Million Nine Hundred Twelve Thousand Five Hundred Pesos – Php 10,912,500.00) and hers in a smaller shoulder bag (Two Million Four Hundred Twenty Five Thousand – Php 2,425,000.00). When she left I escorted her to the lobby of our condominium with her and saw her board a Toyota Camry.

68. Ruby called and said that her driver "Al" will go to my office in 2502 Discovery Suites to pick up the balance of the commission. She said she will not go up to my office anymore since she needed to rush and meet someone. Her driver, Al, arrived and I handed him a sealed computer box for the Senator containing Ten Million Nine Hundred Twelve Thousand Five Hundred Pesos (Php 10,912,500.00) and a paper bag containing Two Million Four Hundred Twenty Five Thousand (Php 2,425,000.00) for Ruby. After he left, I called Ruby and told her how much was in the box and in the paper bag.

69. Rhoda Mendoza called and requested for an advance payment for the project, even though the documents were still being processed, since

according to her she and her boss badly needed the money. I placed the cash in two (2) separate paper bags one for Dir. Javellana containing Four Million Eight Hundred Fifty Thousand Pesos (Php 4,850,000.00) and another one for Rhoda Mendoza containing Two Million Four Hundred Twenty Five Thousand Pesos (2,425,000.00). After sealing the paper bags, I instructed one of my staff driver, John Raymond De Asis, to meet Rhoda in Starbucks in Tektite Tower. Rhoda requested that she be met up there since she did not want to bring such a big amount without a vehicle.

70. In SARO # 09-040847 the amount is Twenty Five Million Pesos (Php 25,000,000.00) and the agency is TLRC.

71. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 11, 250,000.00
Ruby Tuazon	10% less tax	Php 2,500,000.00
Antonio Ortiz and Maya Santos	10% less tax	Php 2,500,000.00
Dennis Cunanan	5% less tax	Php 1,250,000.00

72. Ruby Tuason called me and told me to produce the necessary amount for a PDAF project of Senator Juan Ponce Enrile amounting to Twenty Five Million Pesos. She was in a rush and was very insisting I take the project and produce the money as her other transaction involving Senator Enrile's "hard" funds that she sold to a certain Bobby Rodriguez is being troublesome. She told me that Bobby Rodriguez is having a hard time producing the agreed amount and in turn puts her in a hard position because she is not able to deliver her end in Senator Enrile's office. I agreed and told her to give me a few days to put up the cash. She insisted that I produce it ASAP and gave me two days to produce the cash. After a few days, I gave her a call and she told me that she will send "Al" to pick up the cash in my office. I placed Eleven Million Two Hundred Fifty Thousand Pesos (Php 11,250,000.00) and Two Million Five Hundred Thousand Pesos (Php

2,500,000.00) in two separate bags and gave the bags to Al after confirming with Ruby Tuason thru a phone call.

73. The cash for Director Ortiz and Dennis Cunanan was picked up by Ms. Catherine Mae "Maya" Santos from my office before the agency released the check to the NGO.

74. In SARO # 09-04952 the amount is Fifty Million Pesos (Php 50,000,000.00) and the agency is NLDC.

75. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 21,375,000.00
Ruby Tuazon	10% less tax	Php 4,750,000.00
Alexis Sevidal	5% less tax	Php 2,375,000.00

76. Ruby Tuason told me to send someone to bring the cash to her house at 1857 Sagu st. Dasmarinas Village Makati. She told me to give the full amount instead of the usual 50% so she can ask for another project as soon as possible. She told me that she needed the money before 5pm because she will be meeting with Atty. Lucila "Gigi" Reyes in the evening. I brought to her house (2) two duffel bags containing Twenty One Million Three Hundred Seventy Five Thousand Pesos (Php 21,375,000.00). I was met by her driver "Al" outside her house, he told me that Ruby instructed him to wait for me outside and to get the bags. I handed over the bags to Al then I left. After a few minutes, I received a call from her and she apologized for not inviting me in because she had visitors. After two weeks, she again called me and insisted to get her commission and told me that her driver Al would pick it up and just put the cash in a sealed paper bag. I placed the cash amounting to Four Million Seven Hundred and Fifty Thousand Pesos (Php 4,750,000.00) and met "Al" in the lobby of Pacific Plaza. He used Ruby's Toyota Camry.



77. The money for Alexis Sevidal was delivered by my staff Evelyn de Leon in the NLDC office in One Corporate Plaza Arnaiz Avenue Makati upon clearing of the check issued by the GOCC.

78. In SARO # 09-04996, the amount is Sixty Million Pesos (Php 60,000,000.00) and the agency is NLDC.

79. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 25,650,000.00
Ruby Tuazon	10% less tax	Php 5,700,000.00
Alexis Sevidal	5% less tax	Php 2,850,000.00

80. Upon instructions of Ruby, Al, her driver picked up a total amount of Eighteen Million Five Hundred Twenty Five Thousand Pesos (Php 18, 525,000.00) in two separate sealed duffel bags, one containing 12,825,000.00 for Senator Enrile and one containing Five Million Seven Hundred Thousand Pesos (Php 5,700,000.00) for Ruby Tuazon. During the delivery, Al brought a tray of Palabok and BBQ for my staff. He was wearing a green shirt at that time. Ruby insisted that I give her the full commission in advance because she needed the cash for an investment. Then after sometime, Ruby called that she will be sending thru fax a copy of the SARO in my office. She also insisted to have someone deliver the balance of the cash for the Senator in her house in 1857 Sagu St. Dasmarinas Village Makati, since her driver is not available that day. To heed her requests, I asked my nephew John Lim to drive me to her house while on my way home from the office. I placed the cash amounting to Twelve Million Eight Hundred Twenty Five Thousand (Php 12,825,000.00) in a sealed duffel bag. Upon reaching her house I just handed over the bag to her maid, but I did not go inside her house.

81. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

82. SARO # G-09-07112, the amount is Forty Million Pesos (Php 40,000,000.00) and the agency is NLDC.

83. The computation of commission is herein provided, to wit:

	Percentage	Amount
Juan Ponce Enrile	45% less tax	Php 17,100,000.00
Gigi Reyes	5% less tax	Php 1,900,000.00
Alexis Sevidal	5% less tax	Php 1,900,000.00

84. Lucila "Gigi" Reyes called me and told me to bring the cash to meet up with her car in the back lobby of Discovery Suites. She told me to put the cash in a sealed paper bag amounting to Eight Million Five Hundred Fifty Thousand Pesos (Php 8,550,000.00). She texted me to have my staff meet her in her car a gold Toyota Sequoia SUV with "7" plate number. I placed the cash in a sealed paper bag as instructed and asked one of my staff to bring it downstairs. Upon receiving a copy of the SARO, Lucila "Gigi" Reyes told me to bring the balance of the cash be brought to her house in # 2 Yakan St., La Vista Village QC. She told me that she would give instructions to the guard in the gate to facilitate entry and let my staff in without leaving an identification card at the gate. I placed the cash for Senator Enrile amounting to Eight Million Five Hundred Fifty Thousand Pesos (Php 8,550,000.00) in a sealed box and One Million Nine Hundred Thousand Pesos (Php 1,900,000.00) in a sealed paper bag for Lucila "Gigi" Reyes. I then asked my staff driver John Raymond De Asis to bring and deliver the box and paper bag to her residence in La Vista Village, Quezon City.

85. On the other hand, the money for Alexis Sevidal (of NLDC) was delivered by my staff Evelyn De Leon in his office at the NLDC at One

Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

In **OMB-C-C-13-0395** (FIO vs. Ramon "Bong" Revilla, et.al.) and **OMB-C-C-13-0316** (NBI vs. Ramon "Bong" Revilla, et.al.) The following transactions occurred with the Office of Senator Ramon "Bong" Revilla ("Sen. Revilla"):

86. In **SARO # ROCS-09-000949**, the amount is Twenty Million Pesos (Php 20,000,000.00) and the agency is NLDC.

87. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Revilla	40%	Php 8,000,000.00
Richard Cambe (cos Sen. Revilla)	5%	Php 1,000,000.00
Alexis Sevidal (NLDC)	5% less tax	Php 950,000.00

88. I was invited for lunch by Senator Revilla in his residence in 114 Sarangani St., Ayala Alabang Village, Muntinlupa. After eating, we talked alone in the dining room and I handed him a paper bag containing cash amounting to Eight Million Pesos (Php 8,000,000.00) as full payment for the listing. After a little small talk, I left since I had another meeting to attend to. Atty Richard Cambe, who is the Chief of Staff of Senator Revilla, personally brought a copy of the SARO to my office in 2502 Discovery Suites. I checked the document and asked my nephew to prepare One Million Pesos (Php 1,000,000.00) to give to Atty. Cambe. My nephew got the cash from my vault in my office and sealed the cash in a brown envelope and handed it to Atty. Cambe who then excused himself to leave afterwards.



89. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

90. In SARO # ROCS-09-04973, the amount is Eighty Five Million (Php 85,000,000.00) and the agency is NLDC.

91. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Revilla	40%	Php 34,000,000.00
Richard Cambe	5%	Php 4,250,000.00
Alexis Sevidal	5% less tax	Php 4,037,500.00

92. Senator Revilla told me that Atty. Cambe will pickup the cash in my office. I prepared the cash and placed an amount of Seventeen Million Pesos (Php 17,000,000.00) in a computer box and prepared a paper bag containing Two Million One Hundred Twenty Five Thousand Pesos (Php 2,125,000.00) for Atty Cambe. I personally gave the box and the paper bag to Atty. Cambe and confirmed with Senator Revilla over the phone before he left. Upon the release of the SARO, Atty. Cambe called and informed me that he will bring the copy of the SARO and that I should prepare the balance of the agreement. I again proceeded to put the cash in a box for Senator Revilla amounting to Seventeen Million Pesos (Php17,000,000.00) and Two Million One Hundred Fifty Thousand Pesos (Php 2,150,000.00) in another paper bag for Atty. Cambe. When Atty. Cambe arrived I gave him the box and paper bag containing the money and confirmed with the senator.

93. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon to his office at the NLDC located at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.



Handwritten signature of the official, with the number 25 written below it.

94. In SARO # ROCS-09-04953, the amount is Fifty Million, and the agency is NLDC.

95. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Revilla	40%	Php 20,000,000.00
Richard Cambe	5%	Php 2,500,000.00
Alexis Sevidal	5% less tax	Php 2,375,000.00

96. Atty. Cambe called up and told me that he and the Senator needed cash. He told me to pay in full in advance for a project. I agreed and I met him at UCC in the 26<sup>th</sup> street at the "Fort Bonifacio" near McDonalds in Global City. I placed cash of Twenty Million Pesos in two (2) sealed small balikbayan boxes for the Senator Two Million Five Hundred Thousand Pesos in a paper bag for Atty. Cambe. I left right away after giving the cash since Atty. Cambe informed me that he needed to rush to Ayala Alabang to meet with Senator Revilla. After leaving, I called Senator Revilla to confirm that I already gave the cash to Atty. Cambe. Senator Revilla in return acknowledged the receipt of the cash via phone call.

97. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

98. In SARO # ROCS-09-2357, the amount is Forty Million (Php 40,000,000) and the agency is NLDC.

99. The computation of rebate and commission is herein provided, to wit:

	Percentage	Amount
Sen. Revilla	40%	Php 16,000,000.00
Richard Cambe	5%	Php 2,000,000.00



76



Alexis Sevidal	5% less tax	Php 1,900,000.00
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100. Atty. Cambe informed me that they had an available fund of Forty Million Pesos (Php 40,000,000.00). He told me that a previous supplier backed out because it cannot comply with their previous agreement. He asked me if I am interested or whether I could pay in full or else he would give the business elsewhere, so I agreed. After I agreed to his offer, I prepared Sixteen Million Pesos (Php16,000,000.00) in cash for Sen. Revilla and Two Million Pesos (Php 2,000,000.00) for Atty. Cambe which I placed in a printer box I found in the office. Thereafter, I gave the said cash to Atty. Cambe when he came by my office to pick it up and in return handed me a copy of the SARO in exchange.

101. On the other hand, the money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati upon clearing of the check issued by the GOCC.

102. In **SARO # G-09-07065**, the amount is Eighty Million (Php 80,000,000.00) and the agency is NLDC.

103. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Revilla	40%	Php 32,000,000.00
Richard Cambe	5%	Php 4,000,000.00
Alexis Sevidal	5% less tax	Php 3,800,000.00

104. When Atty. Cambe visited my office to receive the cash as we agreed upon regarding the implementation, he told me that he was expecting another listing worth P 80,000,000 to be released soon. He instructed me to prepare the amount of Sixteen Million Pesos (Php16,000,000.00) as advance payment. I was not prepared to make the payment then thus it was only



when he followed up after a few a few days that I agreed to pay. The next day he dropped by my office again and picked-up the agreed amount and I handed him the cash I placed in a box worth Sixteen Million Pesos (Php 16,000,000.00) for Sen. Revilla and One Million Pesos (Php 1,000,000.00) for him, which I placed in an envelope. Afterwards, I asked for more time to be able to comply with the rest of the advance for him because I was not able to secure enough funds from the bank. Atty. Cambe called up and assured to me that he will surely get the SARO therefore I should prepare the rest of the amount as advance payment. The next day, he went to my office to get the cash I placed in a box worth Sixteen Million Pesos (Php 16,000,000.00) for Senator Revilla and the Three Million Pesos (Php 3,000,000.00) to Atty. Cambe, which I handed to him in a paper bag. He spent the whole afternoon in my office that day because he had to wait for the cash to be released by the bank.

105. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati upon clearing of the check issued by the GOCC.

As regards the cases, **OMB-C-C-13-0397** (FIO vs. Jose "Jinggoy" Ejercito Estrada, et.al.) and **OMB-C-C-13-0313** (NBI vs. Jose "Jinggoy" Ejercito Estrada, et.al.) The following transactions occurred with the Office of Senator Jose "Jinggoy" Ejercito Estrada ("Sen. Estrada"):

106. In SARO # **ROCS-08-01698**, the amount involved is Twenty Five Million Pesos (Php 25,000,000.00) and the agency is DA-NABCOR.

107. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	45%	Php 12,500,000.00



OR



Ruby Tuazon	10%	Php 2,500,000.00
Allan Javellana	10%	Php 2,500,000.00
Rhoda Mendoza	5%	Php 1,250,000.00

108. Ruby Tuazon told me to accommodate a cash advance worth Fifteen Million Pesos (Php 15,000,000.00) because she is expecting to get a project soon from Sen. Estrada. She succeeded in convincing me to accept the project because it was Christmas time and that she badly needed the money. After I agreed, she went to my office and picked-up cash worth Twelve Million Five Hundred Thousand (Php 12,500,000.00) for Senator Estrada and Two Million Five Hundred Thousand (Php 2,500,000.00) for her as her commission. I remember she gave me fruitcake then as a Christmas gift and she was very grateful that I was able to accommodate her request. I could vividly recall that she was wearing a red dress that night because she told me that she was going to attend a Christmas party. I went with her to the lobby as I was also leaving the office then. I rode my car and she was picked up by a van.

109. When the project documents were processed at NABCOR, Rhoda Mendoza, the assistant of Director Allan Villanueva called me up and told me that I could get the check upon giving them the amount of Two Million Five Hundred Thousand (Php 2,500,000.00) for Allan Javellana and One Million Two Hundred Fifty Thousand (Php 1,250,000.00) for herself. She picked up the cash in my office at the 2502 Discovery Suites a day before the check was released. I personally gave the paper bag containing the money to her.

110. In SARO # ROCS-08-01697 the amount is Twenty Five Million Pesos (Php 25,000,000.00) and the agency is DA-NABCOR.

111. The computation of commission is herein provided, to wit:



	Percentage	Amount
Sen. Estrada	45%	Php 11,250,000.00
Ruby Tuazon	10%	Php 2,500,000.00
Allan Javellana	10%	Php 2,500,000.00
Rhoda Mendoza	5%	Php 1,250,000.00

112. Ruby approached me and told me of an incoming project amounting to Twenty Five Million Pesos (Php 25,000,000.00). She told me that she needed her portion amounting to Two Million Five Hundred Thousand Pesos (Php 2,500,000.00) because she needs the money ASAP. She also said she will be getting the balance (Senator's portion) upon the release of the SARO amounting to Eleven Million Two Hundred Fifty Thousand Pesos (Php 11, 250, 000.00). Upon release of the SARO Ruby called me and told me to prepare the cash for the Senator amounting to Eleven Million Two Hundred Fifty Thousand Pesos (Php 11,250,000.00). She told me that she would have her driver pick it up in my office in Discovery suites. Ruby's driver "Al" came and picked up the cash that I placed in a printer box. Rhoda Mendoza went to my office in discovery and picked up her's and Director Javellana's portion after the release and clearing of the check from their agency.

113. In SARO # ROCS-08-03116, the amount is Twenty Million Pesos (Php 20,000,000.00) and the agency is DA-NABCOR.

114. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	30%	Php 6,000,000.00
Ruby Tuazon	25%	Php 5,000,000.00
Allan Javellana	10%	Php 2,000,000.00
Rhoda Mendoza	5%	Php 1,000,000.00





115. Ruby went to me and brought me a SARO dated above. She told me that her buyer could not deliver on their agreed payment since the buyer still has a balance on a previous "HARD" SARO that they went into business with. She told me to split the cash senator and her this way since the senator promised her an early birthday cash present.

116. Rhoda Mendoza picked up hers and Dir. Javellanas portion from my office in two separate paper bags containing One Million Pesos (Php 1,000,000.00) and Two Million Pesos (Php 2,000,000.00) respectively.

117. In **SARO # ROCS-08-06025**, the amount is Forty Two Million Pesos (Php 42,000,000.00) and the agency is DA-NABCOR.

118. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	45%	Php 18,900,000.00
Ruby Tuazon	10%	Php 4,200,000.00
Allan Javellana	10%	Php 4,200,000.00
Rhoda Mendoza	5%	Php 2,100,000.00

119. I was invited by Ruby in her rented house in Zagu St. Dasmarinas Village. While having lunch she showed me a listing amounting to Forty Two Million Pesos (Php 42,000,000.00). She insisted that she makes an advance of Five Million Pesos (Php 5,000,000.00) before she agrees to give me the project. I told her that I was not liquid that time and she replied that if that was the case she would give the project to someone else. I left her house thereafter and never heard of the project again until after sometime. Ruby called me and told me that she has an available SARO amounting to Forty Two Million Pesos (Php 42,000,000.00). She insisted that I pay the full amount upfront before I could give me the funds. Since the SARO is already available I agreed. She instructed me to prepare the cash the next day and give her a call if its available and ready for pickup in my office already. I placed the senator's portion amounting to Eighteen Million



Nine Hundred Thousand Pesos (Php 18,900,000.00) and hers Four Million Two Hundred Thousand Pesos (Php 4,200,000.00) in two separate bags. I gave her a call that the cash is available and she told me that she will send her driver "Al" to pick it up. Upon Al's arrival I gave her a call and confirmed that "Al" was in my office and I gave the bags to him already.

120. Upon clearing of the check Rhoda Mendoza picked up her's and director Javellana's portion amounting to Two Million One Hundred Thousand Pesos (Php 2,100,000.00) and Four Million Two Hundred Thousand Pesos (Php 4,200,000.00) respectively. I placed the cash in separate paper bags and gave it to Rhodora Mendoza.

121. In SARO # ROCS-09-02769, the amount is Thirty Million Pesos (Php 30,000,000.00) and the agency is NLDC.

122. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Jinggoy	45%	Php 13,500,000.00
Ruby Tuason	10%	Php 3,000,000.00
Alexis Sevidal	5% less tax	Php 1,425,000.00

123. Ruby Tuason went to my office and gave me a copy of a SARO worth Thirty Million Pesos (Php 30,000,000.00). She told me that she won't be needing an advance until the check is cleared from the agency. I asked why she's only telling me about this SARO now. She told me that she was supposed to sell the PDAF to Patricia "Gay" Agana Tan but they are having problems with Patricia "Gay" Agana Tan not delivering goods in their previous engagements. She further said that projects in ZREC amounting to Twenty Nine Million and Forty Eight Million Pesos have been very troublesome. I later on remembered the transactions when the said transaction came out in the newspapers sometime February 2013. When the check was released, she told me to have the cash delivered to her rented home in Zagu St., Dasmarinas Village. I placed Thirteen Million Five





Hundred Thousand Pesos (Php 13,500,000.00) and Three Million Pesos (Php 3,000,000.00) in two separate duffle bags and dropped of the bags in her rented home in Zagu St. Dasmarinas Village on my way home from the office that day.

124. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

125. In SARO # ROCS-09-02770, the amount is Nine Million Seven Hundred Thousand Pesos (Php 9,700,000.00) and the agency is DA-NABCOR.

126. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	45%	Php 4,365,000.00
Ruby Tuazon	10%	Php 970,000.00
Allan Javellana	10%	Php 970,000.00
Rhoda Mendoza	5%	Php 485,000.00

127. Ruby Tuazon called me to let me know that her driver "Al" was on his way to my office. Accordingly, he had with him a copy of a SARO with an amount of Nine Million Seven Hundred Thousand (Php 9,700,000.00). She told me that the driver would wait for the advance payments for the said SARO. That moment, I told her that I don't have available money for the project but will have it by the next day. So, the next day before I went to my office, I passed by Tuazon's house at 1857 Sagu St. Dasmarinas, Makati in order to give her a black bag of cash worth Four Million Three Hundred Sixty Five Thousand (Php 4,365,000.00) for Sen. Estrada and Nine Hundred Seventy Thousand Pesos (Php 970,000.00) for Ruby Tuazon. Her maid received the cash on her behalf. After her maid received the bag with cash, I left her house for work. After a few hours,

Ruby Tuazon called me up to confirm that she has received the bag with the cash.

128. Rhoda Mendoza, on the other hand, received in my office the cash intended for Allan Javellana and her share. She also instructed me to put the cash in two separate paper bags—one paper bag containing Nine Hundred Seventy Thousand Pesos (Php 970,000.00) for Allan Javellana and Four hundred Eighty Five Thousand Pesos (Php 485,000.00) for herself. She picked up the paper bag in my office and I personally gave it to her.

129. In SARO # ROCS-09-01612, the amount is Nineteen Million Four Hundred Thousand Pesos (Php 19, 400,000.00) and the agency is NLDC.

130. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	50%	Php 9,700,000.00
Ruby Tuazon	10%	Php 1,940,000.00
Alexis Sevidal	5%	Php 921,500.00

131. Ruby Tuazon called me and told me that her driver is already on his way to my residence to hand me an envelope with a copy of a SARO inside worth Nineteen Million Four Hundred Thousand Pesos (19,400,000.00) under Senator Estrada's PDAF. I called her up to confirm that I already received the envelope with SARO but told her that I don't have the funds to commit at that moment and further advised her to call me after two (2) days. After two (2) days, she called me again and insisted that I commit the funds. In return, I told her that I have already prepared the cash needed in my office in Ortigas. After which, her driver Al pick it up so I handed his driver a black bag with cash worth Nine Million Seven Hundred Thousand Pesos (Php 9,700,000.00) intended for Senator Estrada and One Million Nine Hundred and Forty Thousand Pesos (Php 1,940,000.00) for Ruby Tuazon as her commission. I also provided her a list of the breakdown

in the bag. Later, I received a phone call from Ruby confirming her receipt of the cash.

132. However, the money intended for Alexis Sevidal was personally delivered by my staff Evelyn De Leon to his office at the NLDC located at One Corporate Plaza, Arnaiz Avenue Makati, upon clearing of the check issued by the GOC

133. In SARO # G-09-07076, the amount is Thirty One Million Pesos (Php 31,000,000.00) and the agency is NLDC.

134. The computation of the commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	55%	Php 17,050,000.00
Pauline Labayen	5%	Php 1,550,000.00
Alexis Sevidal	5%	Php 1,472,500.00

135. Pauline Labayen, who is a staff of Senator Estrada went to my office to inform me that they are expecting funds worth Thirty One Million Pesos (Php 31,000,000.00) to be released in their favor. She asked for fifty five percent (55%) for Senator Estrada and five (5%) related commission for her. I gave her Eight Million Five Hundred Twenty Five Thousand Pesos (Php 8,525,000.00) for Senator Estrada and Eight Hundred Fifty Two Thousand Five Hundred Pesos (Php 852,500.00) for her. She requested me to place the Senator's money to be placed in a box and to put hers in a bag. She was in a rush to leave because she needed to go back to the Senate. That time, she asked her driver to go to the lobby and carry the box so they could leave immediately. When the SARO was released, Pauline met with me to hand over a copy of the SARO. She asked for the rest of their share, thus I handed her a red bag with cash worth Eight Million Five Hundred Twenty Five Thousand Pesos (Php 8,525,000.00) for Senator Estrada and Eight Hundred Fifty Two Thousand Five Hundred Pesos (Php 852,500.00) is for her.





136. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

137. In SARO # G-09-07579, the amount is Fifty Million Pesos (Php 50,000,000.00), and the agency is NLDC.

138. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	55%	Php 27,500,000.00
Pauline Labayen	5%	Php 2,500,000.00
Alexis Sevidal	5%	Php 2,375,000.00

139. Pauline Labayen invited me to dine with her at L' Opera at the Fort strip in Bonifacio Global City. During the dinner, she showed me a SARO worth 50,000,000. She gave the terms of 60%, broken down as 55% for Senator Estrada and 5% for her. She also insisted that the full payment be given at once since the SARO was already released. I told her I will think about it. After a week, she asked me if I was ready to deliver the cash she proposed. After I said yes, she told me to deliver the same at "Tips and Toes", Wilson St. Greenhills, which she owned. I placed the cash in two small sized balikbayan boxes, which contained Twenty Seven Million Five Hundred Thousand Pesos (Php 27,500,000.00) for the Senator and Two Million Five Hundred Thousand Pesos (Php 2,500,000.00) for her and proceeded to her parlor. When I got there, she met me outside the parlor and she transferred the box from my car to the trunk of her car. I remember she had personalized plates in her car.

140. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.



141. In SARO # F-09-09580, the agency is NLDC, and the amount is Twenty Four Million Two Hundred Fifty Thousand Pesos (Php 24,250,000.00) and the agency is NLDC

142. The computation of commission is herein provided, to wit:

	Percentage	Amount
Sen. Estrada	55%	Php 13,337,500.00
Pauline Labayen	2%	Php 500,000.00
Alexis Sevidal	5% after tax	Php 1,151,875.00

143. A week after I met Pauline Labayen in Greenhills, I received a call from her again. She told me that Senator Estrada wanted to talk to me, and I did. During our conversation, he told me that he is expecting a project worth Twenty Four Million Two Hundred Fifty Thousand Pesos (Php 24,250,000.00) and offered the project to me. He instructed me to bring the agreed amount at his office at #82 Lt. Artiaga San Juan the next evening so we could also meet me in person. The next night, I prepared Thirteen Million Three Hundred Thirty Seven Thousand Five Hundred Pesos (Php 13,337,500.00), the amount he insisted, and placed it in a box. I went to his office as he instructed and met the Senator Estrada in person for the first time. When I handed the box to him, he instructed one of his staff to put it in his office at the ground floor. I did not stay long in his office because I was tired that day.

144. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

145. In SARO # F-09-09579, the amount is Twenty Five Million Pesos (Php 25,000,000.00) and the agency is NLDC.

146. The computation of commission is herein provided, to wit:



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	Percentage	Amount
Sen. Estrada	55%	Php 13,750,000.00
Pauline Labayen	5%	Php 1,250,000.00
Alexis Sevidal	5% after tax	Php 1,187,500.00

147. Pauline Labayen called me to inform me that SARO # F-09-09580 was already released. Then she offered me another project worth Twenty Five Million Pesos (Php 25,000,000.00). She told me to prepare the cash the next day so she can bring the copies of the SARO. She went to my office the next day. I gave her Thirteen Million Seven Hundred Fifty Thousand Pesos (Php 13,750,000.00) for Senator Estrada and One Million Two Hundred Fifty Thousand Pesos (Php 1,250,000.00) for Pauline serving as her commission. She also asked for a bonus for the earlier project. Thus, I gave her an additional Five Hundred Thousand Pesos (Php 500,000.00) which I placed in a bag together with her share for the new project. I placed the cash for the Senator in a computer box.

148. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, after the clearing of the check issued by the GOCC.

149. Based on my recollection, the transactions at DA ZREC by Sen. Estrada was transacted by Ruby Tuazon using a different set of NGOs/Suppliers (Pangkabuhayan Foundation Inc./Patricia Agana Tan). Ruby insisted for a higher percentage of commission, but I cannot comply with her terms, otherwise the delivery will suffer, because according to her, she knows someone else that offers a better commission. This is one of the reasons why we parted ways.





In **OMB-C-C-14-0015**, **OMB-C-C-14-0016** (FIO vs. Samuel M. Dangwa et.al.) and **OMB-C-C-13-0315** (NBI vs. Samuel M. Dangwa, et.al.) The following transactions occurred with the Office of Congressman Samuel M. Dangwa ("Cong. Dangwa"):

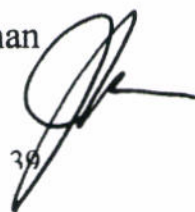
150. As far as I can remember Carlos Lozada, the staff of Congressman Samuel Dangwa would initiate the transactions with me and offer their PDAF. The terms he gave were fifty percent (50%) for Congressman Samuel Dangwa and five percent (5%) for himself and Erwin Dangwa. The proceeds intended for the congressman and agents are usually picked up either in our office in Discovery Suites, Starbucks in Podium or brought to the office of the legislator by one of my staff. Carlos Lozada or Erwin Dangwa were usually the ones who receives the cash and usually placed in separate paper bags. The portion for the funds intended for the implementing agency is usually delivered to the person in the agency after en-cashing the check issued by the agency. On occasion portions intended for Antonio Ortiz, Dennis Cunanan, Allan Javellana and Rhoda Mendoza are demanded by them before they release the check to the NGO.

151. In **SARO # ROCS-09-01612**, the amount is Nine Million Pesos (Php 9,000,000.00) and the agency is NLDC.

152. The computation of the commission is herein provided, to wit:

	Percentage	Amount
Cong. Dangwa	50%	Php 4,275,000.00
Carlos Lozada/Erwin Dangwa	5%	Php 427,500.00
Alexis Sevidal	5% after tax	Php 427,500.00

153. Carlos Lozada, a staff of Congressman Dangwa, went to my office offering me a project worth 9,000,000. He informed me that it will be implemented at NLDC. He gave me the terms of 50% for Congressman



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Dangwa and 5% for himself. They next day I asked my staff, Evelyn De Leon, to meet the son of Congressman Dangwa, Erwin Dangwa, in Starbucks, Podium to hand him the money. The cash was placed in two separate paper bags, one for the Congressman worth Four Million Two Hundred Seventy Five Thousand Pesos (Php 4,275,000.00) and another for Carlos Lozada amounting to Four hundred Twenty Seven Thousand and Five Hundred Pesos (Php 427,500.00).

154. The money for Alexis Sevidal again was delivered by my staff Evelyn De Leon in his office at the NLDC at One Corporate Plaza Arnaiz Avenue Makati, after the clearing of the check issued by the GOCC.

155. For transactions with Congressman Samuel Dangwa. The computation of the commission is herein provided, to wit:

SARO No.	Date	Amount	Agency	SAMUEL DANGWA 50%	CARLOS LOZADA/ ERWIN DANGWA 5%	ALEXIS SEVIDAL (NLDC) 5% AFTER TAX	ANTONIO ORTIZ/MAYA SANTOS (TRC) 10%	DENNIS CUNANAN (TRC) 5%	ALLAN JAVELLANA (NABCOR) 10%	RHODA MENDOZA (NABCOR) 5%
ROCS-07-09157	11/6/07	8,000,000	TRC	4,000,000.00	400,000.00		800,000.00	400,000.00		
ROCS-08-03249	4/14/08	8,000,000	NABCOR	4,000,000.00	400,000.00				800,000.00	400,000.00
ROCS-08-09584	12/3/08	8,000,000	NABCOR	4,000,000.00	400,000.00				800,000.00	400,000.00
G-09-08134	11/6/09	9,000,000	NLDC	4,500,000.00	450,000.00	427,500.00				
ROCS-07-02040	2/1/07	1,000,000	TRC	500,000.00	50,000.00		100,000.00	50,000.00		
ROCS-07-03078	2/13/07	10,000,000	TRC	5,000,000.00	500,000.00		1,000,000.00	500,000.00		
ROCS-07-09157	Not indicated	6,400,000	TRC	3,200,000.00	320,000.00		640,000.00	320,000.00		
ROCS-08-03249	7/22/08	6,984,000	NABCOR	3,492,000.00	349,200.00				698,400.00	349,200.00
ROCS-08-09584	5/27/09	1,164,000	NABCOR	582,000.00	58,200.00				116,400.00	58,200.00
ROCS-08-09584	6/8/09	6,596,000	NABCOR	3,298,000.00	329,800.00				659,600.00	329,800.00
G-09-08134	2/10/10	2,700,000	NLDC	1,350,000.00	135,000.00	128,250.00				
	2/23/10	4,500,000	NLDC	2,250,000.00	225,000.00	213,750.00				
	4/23/10	1,800,000	NLDC	900,000.00	90,000.00	85,500.00				
ROCS-07-02040	Not indicated	9,200,000	TRC	4,600,000.00	460,000.00		920,000.00	460,000.00		
ROCS-07-03078	Not indicated	9,600,000	TRC	4,800,000.00	480,000.00		960,000.00	480,000.00		



In **OMB-C-C-14-0018** (FIO vs. Rodolfo G. Plaza et.al.) and **OMB-C-C-13-0319** (NBI vs. Rodolfo G. Plaza, et.al.) The following transactions occurred with the Office of Congressman Rodolfo G. Plaza ("Cong. Plaza"):

156. In **SARO # D-09-04013**, the amount is Five Million Pesos (Php 5,000,000.00) and the agency is NLDC.

157. The computation of the commission is herein provided, to wit:


	Percentage	Amount
Cong. Plaza	50%	Php 2,500,000.00
Alexis Sevidal	5%	Php 225,000.00

158. The full payment to Cong. Plaza was personally picked up by him in cash at Discovery Suites. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon at his office in the NLDC at One Corporate Plaza Arnaiz Avenue Makati, after the clearing of the check issued by the GOCC.

159. In **SARO # ROCS-09-03030**, the amount is Two Million Five Hundred Thousand Pesos (Php 2,500,000.00) and the agency is NLDC.

160. The computation of commission is herein provided, to wit:

	Percentage	Amount
Cong. Plaza	50%	Php 1,250,000.00
Alexis Sevidal	5%	Php 118,750.00



161. The cash was delivered at the residence of Cong. Plaza in #71 Tagbilaran St., Alabang Hills by my staff driver John Raymond De Asis. The cash was placed in a sealed brown envelope. Later in the evening I received a call from Congressman Plaza confirming his receipt. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon to his office in the NLDC at One Corporate Plaza, Arnaiz Avenue, Makati, after the clearing of the check issued by the GOCC.

162. In SARO # ROCS-09-06339, the amount is Seven Million Five Hundred Thousand Pesos (Php 7,500,000.00) and the agency is NLDC.

163. The computation of commission is provided herein, to wit:

	Percentage	Amount
Cong. Plaza	50%	Php 3,750,000.00
Alexis Sevidal	5%	Php 356,250.00

164. The full payment to Cong. Plaza was deposited in his Metrobank account. The cash for Alexis Sevidal was delivered by my staff Evelyn De Leon at his office in the NLDC at One Corporate Plaza, Arnaiz Avenue, Makati, upon clearing of the check issued by the GOCC.

165. Payments to Congressman Rodolfo Plaza are either picked up by him in my office in the Discovery Suites, delivered to his residence in #71 Tagbilaran St., Alabang Hills by my staff driver John Raymond De Asis or deposited to his personal metrobank account. The money for Alexis Sevidal was delivered by my staff Evelyn De Leon at his office in the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC. Payments to Allan Javellana and Rhoda Mendoza are either

picked up by Rhoda Mendoza in my office or she is met up by my staff somewhere in or near her office building in the Philippine Stock Exchange Ortigas.

166. For transactions with Congressman Rodolfo G. Plaza.  
The computation of the commission is herein provided, to wit:



SARO No.	Date	Amount	Agency	Rodolfo Ompong Plaza 50%	ALEXIS SEVIDAL (NLDC) 5% AFTER TAX	ALLAN JAVELLANA (NABCOR) 10%	RHODA MENDOZA (NABCOR) 5%
ROCS-08-00388	1/10/08	5,500,000	NABCOR	2,750,000.00		550,000.00	275,000.00
ROCS-08-05176	6/10/08	7,000,000	NABCOR	3,500,000.00		700,000.00	350,000.00
D-09-04013	6/4/09	5,000,000	NLDC	2,500,000.00	225,000.00		
ROCS-09-03030	5/12/09	2,500,000	NLDC	1,250,000.00	123,750.00		
ROCS-09-06339	8/20/09	7,500,000	NLDC	3,750,000.00	356,250.00		

*Jim*

In **OMB-C-C-14-0017** (FIO vs. Rizalina Seachon-Lanete) and **OMB-C-C-13-020** (NBI vs. Rizalina Seachon-Lanete, et.al.) The following transactions occurred with the Office of Congresswoman Rizalina Seachon-Lanete ("Cong. Lanete"):

167. In lieu of cash advances, Congresswoman Lanete requests additional supplies to be distributed to her constituents in the 3<sup>rd</sup> district of Masbate instead. Alexis Sevidal got 5% commission amounting to Four Hundred Seventy Five Thousand Pesos (Php 475,000.00). The commission of Alexis delivered in person by my staff Evelyn de Leon at his office in the NLDC at One Corporate Plaza Arnaiz avenue Makati, upon clearing of the check issued by the GOCC.

168. For transactions with Congresswoman Rizalina Seachon-Lanete. The computation of the commission is herein provided, to wit:



SARO No.	Date	Amount	Agency	ALEXIS SEVIDAL (NLDC) 5% AFTER TAX	ANTONIO ORTIZ/MAYA SANTOS (TRC) 10%	DENNIS CUNANAN (TRC) 5%	ALLAN JAVELLANA (NABCOR) 10%	RHODA MENDOZA (NABCOR) 5%
ROCS-07-00699	1/16/07	5,000,000	TRC		500,000.00	250,000.00		
ROCS-07-02116	2/7/07	5,000,000	TRC		500,000.00	250,000.00		
ROCS-07-02964	2/9/07	15,000,000	TRC		1,500,000.00	750,000.00		
ROCS-07-07211	9/25/07	5,000,000	TRC		500,000.00	250,000.00		
ROCS-07-09368	12/7/07	5,000,000	TRC		500,000.00	250,000.00		
ROCS-08-00123	1/9/08	9,000,000	TRC		900,000.00	450,000.00		
ROCS-08-00124	1/9/08	1,000,000	---					
ROCS-08-03727	5/7/08	15,000,000	NABCOR				1,500,000.00	750,000.00
ROCS-08-07174	10/2/08	13,290,000	NABCOR				1,329,000.00	664,500.00
ROCS-08-07175	10/2/08	1,710,000	---					
ROCS-09-04182	6/18/09	10,000,000	NABCOR					
G-09-07620	10/14/09	10,000,000	NLDC	475,500.00				
ROCS-09-01695	4/13/09	20,000,000	NLDC	950,000.00				



In **OMB-C-C-14-0007** (FIO vs. Constantino Jaraula et.al.) and **OMB-C-C-13-0317** (NBI vs. Constantino Jaraula, et.al.) The following transactions occurred with the Office of Congressman Constantino Jaraula ("Cong. Jaraula"):

169. In **SARO # ROCS-07-00580**, the amount is Ten Million Pesos (Php 10,000,000.00) and the agency is TRC.

170. The computation of the commission is herein provided, to wit:

	Percentage	Amount
Cong. Jaraula	50%	Php 5,000,000.00
Antonio Ortiz	10%	Php 960,000.00
Dennis Cunanan	5%	Php 480,000.00

171. I cannot recall the details during the time when he picked up his advances but he is the one personally getting his commission at Discovery Suites and was handed by me. The commission of Antonio Ortiz was picked up by himself in Pancake House in Malayan Building in Ortigas. Dennis Cunanan was met up by my nephew John Lim in the parking lot of Metrowalk in Ortigas.

172. For transactions with Congressman Constantino Jaraula. The computation of the commission is herein provided, to wit:



<b>SARO No.</b>	<b>Amount</b>	<b>Agency</b>	<b>Congressman Constantino Jaraula 50%</b>	<b>ANTONIO ORTIZ/MAYA SANTOS (TRC) 10%</b>	<b>DENNIS CUNANAN (TRC) 5%</b>
ROCS-07-00580	10,000,000	TRC	5,000,000.00	1,000,000.00	500,000.00
ROCS-07-00861	10,000,000	TRC	5,000,000.00	1,000,000.00	500,000.00
ROCS-07-05450	10,000,000	TRC	5,000,000.00	1,000,000.00	500,000.00



In **OMB-C-C-14-0003** (FIO vs. Edgar Valdez) and **OMB-C-C-13-0314** (NBI vs. Edgar Valdez, et.al.) The following transactions occurred with the Office of Congressman Valdez ("Cong. Valdez"):

173. In **SARO # ROCS-09-04258**, the amount is Ten Million Pesos (Php 10,000,000.00) and the agency is NLDC.

174. In lieu of cash advances, Congressman Valdez requested additional supplies to be distributed to the province of Cotabato. Alexis Sevidal got 5% commission amounting to Four Hundred Seventy Five Thousand Pesos (Php 475,000.00). The commission of Alexis delivered in person by my staff Evelyn de Leon at his office in the NLDC at One Corporate Plaza Arnaiz Avenue Makati, upon clearing of the check issued by the GOCC.

175. For transactions with Congresswoman Edgar Valdez. The computation of the commission is herein provided, to wit:

A handwritten signature in black ink, appearing to be a stylized 'J' or 'G' followed by a long horizontal stroke.



SARO No.	Date	Amount	Agency	ALEXIS SEVIDAL (NLDC) 5% AFTER TAX	ANTONIO ORTIZ/MAYA SANTOS (TRC) 10%	DENNIS CUNANAN (TRC) 5%	ALLAN JAVELLANA (NABCOR) 10%	RHODA MENDOZA (NABCOR) 5%
ROCS-07- 03546	2/16/07	15,000,000	TRC		1,500,000.00	750,000.00		
ROCS 07- 07407	10/16/07	5,000,000	TRC		500,000.00	250,000.00		
ROCS-08- 08006	10/9/08	12,000,000	NABCOR				1,200,000.00	600,000.00
ROCS 08- 03923	5/7/08	10,000,000	NABCOR				1,000,000.00	500,000.00
ROCS 09- 02362	4/14/09	15,000,000	NLDC	712,500.00				
ROCS 09- 04258	6/25/09	15,000,000	NLDC	712,500.00				

## CONCLUSION

176. As stated, I am executing this affidavit to shed light on the facts and circumstances surrounding the PDAF and Malampaya Fund scams involved in the cases pending before this Honorable Office and to support my request to be utilized as state witness and to be granted immunity from criminal prosecution in accordance with Section 17 of R.A. 6770.

177. I have also attached herewith some of the documents which I was able to retrieve through the help of my staff, to wit:

- Annex A – Metrobank Check with No. 2550388964 issued in favor of Ruby Tuazon.
- Annex B – Metrobank Check with No. 0354123445 issued in favor of Carl Dominic Labayen
- Annex C – Metrobank Check with No. 0733638728 issued in favor of Rosemary V. Tuazon
- Annex D – Metrobank Check with No. 0354123459 issued in favor of Dennis Cunanan.

Other pieces of documentary evidence are still being retrieved and will be submitted when available.

178. Honorable Ombudsman, please understand my situation. I am only an ordinary businesswoman who wanted to earn for my family. I had all the intention to comply with all the requirements of the law. In my interest to be able to have business, I only complied of

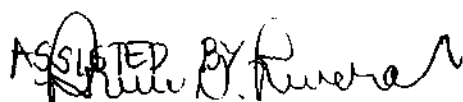
what is required of me by the government officials I was dealing with. I am not capable to do such a complicated scheme to be the mastermind of all these.

179. I am a mother and a wife foremost. I just wanted to make a living for my family. Thus, as a mother, I am appealing for the exclusion of my children **James Christopher Napoles** and **Jo Christine Napoles** in the above-mentioned Complaints. My children had no knowledge, participation and involvement whatsoever in the subject cases.

180. Evelyn De Leon, John Raymond De Asis and Ronald John Lim and Eulogio Rodriguez are also requesting to be utilized as state witnesses and be granted immunity from prosecution. They too are willing to execute their own affidavit in support of the request.

181. I am executing this Affidavit to attest to the truth of the foregoing statement.


IN WITNESS WHEREOF, I have hereunto set my hand and affixed my signature this MAY 12 2014 day of May, 2014 in Makati City.

ASSISTED BY   
ATTY. BRUCE V. RIVERA

  
JANET LIM NAPOLES  
Affiant

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of MAY 12 2014 2014 at CITY OF MAKATI City affiant exhibited to me her Passport No. EB 8041872 issued at \_\_\_\_\_ on \_\_\_\_\_.

Doc. No. 475 ;  
Page No. 96 ;  
Book No. 15 ;  
Series of 2014.

  
ATTY. LANE S. CUI-DAVID  
Commission No. M-195  
Notary Public for Makati City  
Until December 31, 2015  
7<sup>th</sup> Floor Solar Century Tower  
100 Tordesillas St. cor HV Dela Costa St.  
Salcedo Village, Makati City 1227  
Attorney's Roll No. 40347  
PTR No. 9794750/01-03-2014/Pasig City  
IRP LR No. 02695/01-03-02/Pasig City  
MCLE Compliance No. IV-0007111/08-02-2012



Annex "A"

007-135-30873-6 007255508756

01020 1530

2550388884

DATE November 11, 2008

PAY TO THE  
ORDER OF

TRUETT WASON

P=12,500,000.00

PESOS

\*TWELVE MILLION FIVE HUNDRED THOUSAND PESOS ONLY\*



**METROBANK**

METROPOLITAN BANK & TRUST COMPANY

J. ABAD SANTOS-MAYHALIGUE BRANCH  
1385 JABAD SANTOS AV TONDO MIA

Do not sign here or the check is void

VERIFICATION

007255508756 01020 1530 2550388884

Anna "B"

**PAY TO THE ORDER OF** \*\*\*CARL DOMINIC A. LABAYEN\*\*\*  
DATE Sept 24 2010  
**\*\*NINE HUNDRED NINETY SEVEN THOUSAND FIVE HUNDRED ONLY\*\***

**Metrobank**  
OPTIONAL OVERSEAS  
FARGAS CON ADD FIVE PASO

**CONFIRMED WITH** Bank of America  
DATE SEP 24 2010 TIME 2:00  
000097500000

Annex "C"


ACCOUNT NO. 7-073-50828-5 ACCOUNT NAME

410

01026 0461 0733638728

PAY TO THE ORDER OF Rosemary U. TUNZON DATE 10-6-2010

PESOS one million Eight Hundred thousand pesos 1,800,000

 **Metrobank**  
METROPOLITAN BANK & TRUST COMPANY  
MAGDALENA BRANCH  
MASANGKAY ST. BINONDO, MANILA


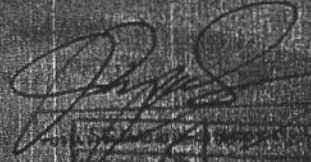
*[Signature]*

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*[Handwritten mark]*



Annex "D"

002-03552410-5 002-03552410-5		AN CORPORATE AN CORPORATE		01028 0678 0354122459 01028 0678 0354122459	
PAY TO THE ORDER OF		DENNIS CUNANAN		DATE October 6, 2010	
PESOS		***Two Million Pesos Only***		**2,000,000.00**	
 <b>Metrobank</b> ORIGAS CENTER J VARGAS COR. ADE AVE. PASIG					
03541224		01028 0678 0354122459		0354122459	