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** ON LEAVE
* DECEASED

26 April 2022

5.9571

DENR Region IV - MIMAROPA

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Attention: **Hon. Lormelyn E. Claudio**
Regional Executive Director

Re: **2 March 2022 Joint Survey for Forest
Land Use Agreement for Tourism
Purposes No. DENR IV-MIMAROPA-
12302030-0010**

Gentlemen:

On behalf of our client, **Ten Knots Philippines, Inc.** ("TKPI"), we write in connection with the joint survey conducted in relation to Forest Land Use Agreement for Tourism Purposes No. DENR IV-MIMAROPA-12302030-0010 ("FLAGT").

To resolve the overlap between TKPI's FLAGT and the original certificates of title ("OCT") issued to Noel Tampe and Baberlyn Gomez,¹ a team composed of personnel from the Department of Environment and Natural Resources ("DENR") Regional Office, the Community Environment and Natural Resources Office ("CENRO"), the DENR's geodetic engineer, and the Protected Area Officer of El Nido conducted a survey on 2 March 2022. TKPI representatives and Israel Gomez were present when the survey was conducted. The team found the survey points referenced in the ground survey that Engineer Nestor D. Veneracion conducted on 27 October 2021 for the DENR.

The 2 March 2022 ground survey focused on the survey points of TKPI's FLAGT but left out the areas that overlap with Noel Tampe's and Baberlyn Gomez' OCTs, which your good office confirmed to be timberland during the 13 January 2022 technical conference attended by key personnel from the DENR Regional Office and the CENRO. To recall, among the issues identified during

¹ Orihinal na Titulo Blg. 2015000225 issued to Baberlyn D. Gomez, Orihinal na Titulo Blg. 2015000222 and 2015000223 issued to Noel Tampe

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that meeting was the erroneous titling of areas that are timberland and are covered by TKPI's FLAGT. To address the issue, your good office explained that a final survey will be conducted and the titles covering timberland will be cancelled. Your good office committed that a reversion case will be filed to reclaim the timberland mistakenly covered by the OCTs.

Also during the 13 January 2022 meeting, the ongoing illegal construction of Israel Gomez in the disputed area was discussed. Your good office confirmed that the issuance of a Notice of Violation is proper because the construction activities are being undertaken without the necessary building permits. For the information of your good office, Israel Gomez continues to build permanent structures even on the foreshore areas. Attached are photos of Gomez' structures, for your consideration and usual prompt action on the matter.

In line with the foregoing developments, we kindly follow up on: (1) the results of the 2 March 2022 ground survey and all other ground verifications on the scope of TKPI's FLAGT, including the 27 October 2021 actual ground survey where it was confirmed that areas claimed by Spouses Israel and Baberyln Gomez, wherein they are performing construction works, fall within the area covered by TKPI's FLAGT; (2) the issuance of the Notice of Violation against the developers in the disputed area; and (3) any developments regarding the reversion case for the timberland erroneously titled.

Thank you for your kind consideration and prompt attention to this matter.

Very truly yours,

ANGARA ABELLO CONCEPCION REGALA & CRUZ

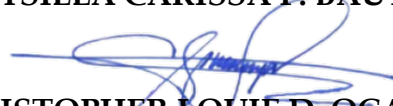
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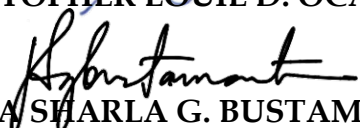
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