



ANGARA ABELLO CONCEPCION REGALA & CRUZ
AW OFFICES

EMERICO D. DE GUZMAN
ANA LOURES TERESA ARNALDO-ORACION
ALEX FERDINAND S. FIDER
JOSEPHINE ALESSANDRA G. COCHICO
SALVADOR L. PEÑA
ROWENA L. GARCIA-FLORES
JEFFERSON M. MARQUEZ
LELAND R. VILLADOLID, JR.
MA. IOLANDA B. ABELLA
RUBY ROSE J. YUSI
PATRICIA-ANN T. PRODIGALIDAD
GILBERTO D. GALLOS
TEODORO D. REGALA, JR.
OLIVER L. PANTALEON
JUDY HAO
REYNALDO J. CONCEPCION
CRESEDA G. BALDONADO
ANDRE B. NAVATO, JR.
ARNOLD M. CORPORAL
JOSE MARTIN R. TENSUAN
CLARENCE DARROW C. VALDECANTOS
NEPTALI B. SALVANERA
VICTOR N. DE LEON
PATRICIA KAY L. TYSMANS-CLEMENTE
CHRISTILA CARRESSA P. BAUTISTA
JOSELITO M. BAUTISTA
ERIC R. RECALDE
JOHN PAUL M. GABA
GEORGE S.D. AQUINO
ANTONIO EDUARDO S. NACHURA, JR.
ANSON BENEDICT C. VELASCO
JOY ANNE C. LEONG-PAMBI
ERWIN JAY V. FILIO
RICHMOND K. LEE
ELAINE PATRICIA S. REYES-RODOLFO
MELISSA ANGELA G. VELARDE
MYRA S. MONTECALVO-QUILATAN
EDUARDO V. SOLENG, JR.
JOSE EDUARDO T. GENILO
ANTONIO JOSE GERARDO T. PAZ
MARIA KRISTINA Z. GARCIA-ANGEL
EVERLENE O. LEE
LOUIE JOHN D. LOOD
JESSA G. WONG-CANTANO

MARIA ISABEL M. LLAVE
JACQUELINE ANN A. TAN
AYLWARD M. CONSULTA
CHRISTOPHER LOUIE D. OCAÑO
MONICA JOY M. MARCELO
JOSEPH ANTHONY I. MALAYA
CHRISTIANNE GRACE F. SALONGA
MARIA ANGELINE L. TAYAG
GENIE CELINI D. NUEVO
JO BLANCA P.B. LABAY
MARTIN LUIS G. SAMSON
BLESSIE MAE P. BUSTAMANTE
CELERRINA ROSE D. FAJARDO
FRANCESCA ABIGAIL C. GESMUNDO
SHIRLEE AMOR P. ROMA
REYNOLD L. ORSUA
RENZ J. PAGAYANAN
JAMES PATRICK O. ALQIADO
ENRIQUE F. NITURA
CHARLEMAGNE RAE P. CHAVEZ
FELICE SUZANNE D. SORIA
JOSE-MARI H. ROCCO
DAN BERNARD S. SABILLA
JOAN JANNETH M. ESTREMADEIRA
MARIA ALTHEA M. TEVES
JACQUELYN ANN MARIE G. ANZURES- GERALDEZ
ARIANNE DOMINIQUE T. FERRER
JOHN FREDERICK E. DERIE
BRIAN ASHLEY M. BALZA
NOELLE JENINA FRANCISCA E. BUAN
KORINA ANA T. MANIBOG
JUAN PABLO G. ALFONSO
DIANNE IRISH A. CADORNA
ANTONIO BONIFACIO C. REYNES
ANGELIMINA D. LENCINA
MARIA IVY KRISTEL M. GONZALES
FATIMA FAYE E. CORDOVA
MERCEZ LOUISE S. RAGAZA
KATE AUBREY G. HOJILLA
ALEEN CHARISSE P. CRUZ
LEIA CLARISSA VERONICA R. VERACRUZ
GILVEN EZRA MARIE L. LI
PAULO N. RABANAL
MARIA KRISTINA D. RECTO
PAULA P. PLAZA
NAPOLEON L. GONZALES III
SAMANTHA BEATRICE P. KING

JOHN ANTHONY F. ALMERINO
TERESE MARIE P. AMOR
MONIQUE B. ANG
ZYRA FRANCES P. AQUILAN
KARLA RAISA M. APOLINARIO
GERMINE MAE A. BASALO
JESSICA MARIA G. BUSTAMANTE
JOHANNA CELINE MARI A. CHAN
JO-ANNE D. COLOQUIO
KYCIA VANLUE G. CUE
JUAN MIGUEL C. DELA CRUZ
RAMON JOSE A. DIMACULANGAN
TIFFANY ANN L. DY
RAFAEL GEORGE G. FILASOL
FRANZINE F. FORONDA
AGUSTIN P. GERALDEZ
FRANCIS L. GERONIMO
JOHN KENNETH LAURENCE A. GONZALES
SHEILA VAE A. HOYLAR
KELVIN Y. HUNG
MERVIN KENNETH C. IGNACIO
KRIS SARAH M. JERITA
KARENINA ISABEL A. LAMPA
CONSTANCE MARIE C. LIM
ANGELO J. LOGRONO
HANNAH LIZETTE S. MANALILI
ROSILYN BIANCA R. MANGASER
MARY ERICA D. MANUEL
KRISTEL MARIZ G. MARAJAS
JOSE RANULFO R. MENDOZA
MARITON B. MOLINA
CHRISTINE P. MONDERIN
ZYRA G. MONTEFOLCA
ERIK JOY B. MURCIA
MICHAEL RYAN NATIVIDAD
HENRY F. OAMINAL, JR.
JOSEPH MARIZ J. ODULIO
SHENNA JANE T. PARADO
JENNY ANN A. PIMENTEL
MARIA CELIA H. POBLADOR
LAURIE CHRISTINE P. QUIAMBAO
ANDRE PHILIPPE E. RAMOS
FAYE MICHELLE L. REGIS
MADELENE RUTH F. SALAZAR
JULIENNE THERESE V. SALVACION
NESTOR FERNANDO T. SIAZON
CLYDE E. TAN
CHARLA LARRAINE S. TSOI
PHILIP CONRAD D. VALES

** ON LEAVE
* DECEASED

NATIONAL COMMISSION ON INDIGENOUS PEOPLES

MIMAROPA Region
3rd Floor, ARGO Building
514 EDSA corner P. Tuazon
Quezon City 1101
ncipmimaropa@gmail.com
region4b@ncip.gov.ph
jjjontila@gmail.com

Attention:

MS. MARIE GRACE T. PASCUA, CESO III
Regional Director, NCIP MIMAROPA

ATTORNEY JANSEN I. JONTILA
Provincial Officer, NCIP Palawan

Re: Follow up on Lifting and Recall of the
Cease and Desist Order dated 7 March
2022

Gentlemen:

On behalf of **Ten Knots Philippines, Inc.** ("TKPI"), we write in relation to the 7 March 2022 Cease and Desist Order ("CDO") issued by the National Commission on Indigenous Peoples ("NCIP"), directing TKPI to stop operating its projects in Villa Libertad and Pasadena, and in furtherance of TKPI's letter of 15th March 2022, requesting, among other relief, the lifting and recall of the CDO.

TKPI categorically and expressly re-affirms its submission to the Free and Prior Informed Consent ("FPIC") process. In all previous communications, TKPI has consistently signified its submission to all lawful processes of your office, including those outlined in Section 59 of the Indigenous Peoples Rights Act, one of which is the FPIC process.

In its letter dated 15 March 2022, TKPI submitted all the necessary documents to facilitate the FPIC process, following the list provided by your office. TKPI's submissions are complete. Your good office has not informed TKPI to the contrary.

More importantly, TKPI's Certificate of Non-Overlap dated 3 September 2013 also remains valid and effective and is not subject of cancellation proceedings whatsoever. Therefore, there is no legal impediment to the lifting and recall of the CDO.

21 March 2022

5.9506

ACCRA LAW®

22/F, ACCRALAW TOWER
CRESCENT PARK WEST, BONIFACIO GLOBAL CITY
1635 TAGUIG, METRO MANILA, PHILIPPINES
TELEPHONE: (632) 8830-8000
FAX: (632) 8403-7007
(632) 8403-7009
E-MAIL: accra@accralaw.com
WEBSITE: www.accralaw.com
MAILING ADDRESS:
MCC P.O. BOX 2462
0770 MAKATI CITY
METRO MANILA, PHILIPPINES

FOUNDING PARTNERS

TEODORO D. REGALA'
MANUEL G. ABELLO'
EDGARDO J. ANGARA'
AVELINO V. CRUZ
JOSE C. CONCEPCION

SENIOR COUNSEL

FRANKLIN M. DRILON

SENIOR LEGAL COUNSEL

VICTOR P. LAZATIN
FRANCISCO ED. LIM

OF COUNSEL

ROGELIO A. VINLIAN
VICTOR P. LAZATIN
LUIS A. VERA CRUZ, JR.
TERESITA J. HERBOSA
EUSEBIO V. TAN
EMITERIO C. MANIBOG, JR.
ALELI ANGELA G. QUIRINO
RAMON G. SAMSON
REGIS V. PUNO

CEBU BRANCH

6/F CEBU HOLDINGS CENTER BLDG.
CEBU BUSINESS PARK (AYALA)
6000 CEBU CITY
PHILIPPINES
TELEPHONE: (632) 231-4223
(632) 231-1449
(632) 231-1032
(632) 231-4266
FAX: (632) 231-3614

E-MAIL: accralawcebu@accralaw.com

DANILO R. DEEN
Of Counsel

JEFFERSON M. MARQUEZ
MA. IOLANDA B. ABELLA
EDUARDO V. SOLENG, JR.
LOUIE JOHN D. LOOD
Resident Partners

AYLWARD M. CONSULTA
BLESSIE MAE P. BUSTAMANTE
FELICE SUZANNE D. SORIA

JOHN ANTHONY F. ALMERINO
TERESE MARIE P. AMOR
GERMINE MAE A. BASALO
SHEILA VAE A. HOYLAR
CONSTANCE MARIE C. LIM
ERIK JOY B. MURCIA
SHENNA JANE T. PARADO
FAYE MICHELLE L. REGIS

DAVAO BRANCH

11/F PRYCE TOWER
PRYCE BUSINESS PARK
J.P. LAUREL AVENUE
8000 DAVAO CITY
PHILIPPINES
TELEPHONE: (632) 224-0996
(632) 224-0998
(632) 224-0984
FAX: (632) 224-0983

E-MAIL: accradavao@accralaw.com

MYRA S. MONTECALVO-QUILATAN
JESSA G. WONG-CANTANO
Resident Partners

GENIE CELINI D. NUEVO
MARTIN LUIS G. SAMSON
JOHN FREDERICK E. DERIE

ZYRA G. MONTEFOLCA



The far-reaching and harmful effects of the CDO to the local community, including indigenous peoples ("IP") groups whose livelihood depend on the local tourism industry and businesses and establishments call for its lifting and recall.

TKPI makes no admissions and reserves its rights under the law.

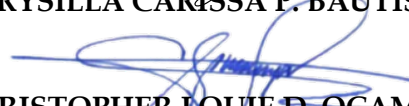
Respectfully,

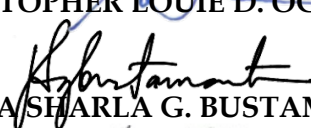
ANGARA ABELLO CONCEPCION REGALA & CRUZ

By:


SALVADOR L. PEÑA


CHRYSILLA CARISSA P. BAUTISTA


CHRISTOPHER LOUIE D. OCAMPO


JESSICA SHARLA G. BUSTAMANTE


MIGUEL RICO E. DE GUZMAN

Copy furnished:

NATIONAL COMMISSION ON INDIGENOUS PEOPLES

Attn: MR. ALLEN A. CAPUYAN

NCIP Chairperson

6th and 7th Floors, Sunnymede IT Center

1614 Quezon Ave.

South Triangle, Quezon City

chairperson.external@ncip.gov.ph

chairpersonsoffice@gmail.com

COMMISSIONER JEORGE M. LARGADO

Commissioner for Region IV-B and Rest of Visayas

comm.islandandrestofluzon@ncip.gov.ph

HON. EDNA G. LIM

Municipal Mayor

El Nido, Palawan

mmoelnido@gmail.com

NATIONAL COMMISSION ON INDIGENOUS PEOPLES

Attn: MR. ROGELIO F.M. BANTAYAN, JR.

Executive Director

6th and 7th Floors, Sunnymede IT Center

1614 Quezon Ave.

South Triangle, Quezon City

oed@ncip.gov.ph

ATTORNEY JONATHAN C. JO

Office of the Clerk of Commission

6th and 7th Floors, Sunnymede IT Center

1614 Quezon Ave.

South Triangle, Quezon City

info@ncip.gov.ph

NATIONAL COMMISSION ON INDIGENOUS PEOPLES

Attn: Attorney Gillian S. Dunuan

Director IV, Legal Affairs Office

6th and 7th Floors, Sunnymede IT Center

1614 Quezon Ave.

South Triangle, Quezon City

lao@ncip.gov.ph

NATIONAL COMMISSION ON INDIGENOUS PEOPLES

Attn: Attorney Caesar M. Ortega

OIC-Director IV, Ancestral Domain Office

6th and 7th Floors, Sunnymede IT Center

1614 Quezon Ave.

South Triangle, Quezon City

ado@ncip.gov.ph

MR. REYNALDO B. DINGAL

Director, Office of Empowerment and Human Rights

oehr@ncip.gov.ph

MS. LORMELYN E. CLAUDIO

Regional Executive Director

Department of Environment and Natural Resources

DENR by the Bay, 1515 L&S Bldg.

Roxas Boulevard, Manila

mimaroparegion@denr.gov.ph

HON. JULIUS ERVIN O. ENCISO

Regional Director, DHSUD IV-B

Department Of Human Settlements and Urban

Development

5th Floor, DHSUD Building

Kalayaan Avenue corner Mayaman Street

Diliman, Quezon City
region4b@dhsud.gov.ph

ATTORNEY BEVIENNE G. MALATEO

Regional Director

Department of Tourism, MIMAROPA

2nd Floor, the New DOT Bldg.,

351 Sen. Gil Puyat Avenue,

Brgy. Bel-Air II, Makati City 1200

dot4b@tourism.gov.ph