

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-CR-20343-KMW**

UNITED STATES OF AMERICA

vs.

**ROGER ALEJANDRO PIÑATE MARTINEZ,
and JORGE MIGUEL VASQUEZ**

Defendants.

/

**GOVERNMENT’S RESPONSE IN OPPOSITION
TO DEFENDANTS’ MOTION TO DISMISS INDICTMENT**

The United States of America, by and through its undersigned counsel, hereby files this Response in Opposition to the Motion to Dismiss Indictment filed by defendant Roger Alejandro Piñate Martinez on April 28, 2025, and adopted by defendant Jorge Miguel Vasquez on May 1, 2025. DE 151, 156. The defendants put forth three arguments in support of the motion: 1) that the Supreme Court’s decision in *United States v. Snyder*, 603 U.S. 1 (2024) should be read as evidence that the FCPA does not prohibit gratuities; 2) that the indictment is infirm because the government has alleged a “gratuities scheme” and has “proffered no evidence” of bribery; and 3) that Article 210 of the Philippine Revised Penal Code is not a permissible specified unlawful activity (“SUA”) under the money laundering statute, 18 U.S.C. § 1956. For the reasons discussed herein, these arguments are without merit and the motion should be denied.

I. Relevant Factual Background

On August 8, 2024, a federal grand jury in the Southern District of Florida returned an indictment charging defendant Piñate and co-defendant Vasquez with conspiracy to violate the Foreign Corrupt Practices Act (“FCPA”) (Count 1), a substantive violation of the FCPA (Count 2), conspiracy to commit money laundering (Count 3), and three counts of international laundering

of monetary instruments (Counts 4-6). DE 12. Elie Moreno and Juan Andreas Donato Bautista were also charged with Counts 3 through 6. Bautista was a “foreign official” during the relevant time, serving as Chairman of the Commission on Elections of the Republic of the Philippines (COMELEC) from on or about April 2015 to October 2017.

The indictment describes three contracts valued at approximately \$182 million that were awarded by COMELEC to corporate affiliates of the Company that employed defendants Piñate (Chief Operating Officer/President), Vasquez (Executive Vice President for Hardware Development), and Moreno (Project Director in the Philippines). The contracts governed the Company supplying COMELEC with voting machines and related services for the 2016 elections in the Philippines. The Company partnered with Vendor A’s Taiwan-based company to manufacture the voting machines.

The government’s investigation uncovered a criminal scheme by the defendants to pay approximately \$1 million in bribes to defendant Bautista in order to obtain and retain contracts and receive payments under those contracts from COMELEC, including a significant reduction of the value added tax (“VAT”) withheld.

II. Legal Standard

An indictment need only be a “plain, concise, and definite written statement of the essential facts constituting the offense charged” and “give the official or customary citation of the statute, rule, regulation, or other provision of law that the defendant is alleged to have violated.” Fed. R. Crim. P. 7(c)(1). In general, an indictment is required to contain only those facts and elements of the alleged offense necessary to sufficiently inform the accused of the charge and to safeguard the accused from double jeopardy. *See Hamling v. United States*, 418 U.S. 87, 117 (1974) (holding “an indictment is sufficient if it, first, contains the elements of the offense charged and fairly informs a defendant of the charge against which he must defend, and second, enables him to plead

an acquittal or conviction in bar of future prosecutions for the same offense”). “[A]n indictment must contain every element of the offense charged.” *United States v. Stefan*, 784 F.2d 1093, 1101 (11th Cir. 1986).

“In judging the sufficiency of the indictment, the court must look to the allegations and, taking the allegations to be true, determine whether a criminal offense has been stated.” *United States v. Fitapelli*, 786 F.2d 1461, 1463 (11th Cir. 1986); *see also United States v. Poirier*, 321 F.3d 1024, 1029 (11th Cir. 2003) (noting that when analyzing challenges to the sufficiency of an indictment, “the appropriate test is not whether the indictment might have been drafted with more clarity, but whether it conforms to minimal constitutional standards”) (quoting *United States v. Varkonyi*, 645 F.2d 453, 456 (5th Cir. 1981)).

Federal courts are not permitted to rule upon questions that are hypothetical, or which do not affect the rights of the parties in the case before the court. *Lewis v. Continental Bank Corp.*, 494 U.S. 472, 477 (1990); *United States v. Johnson*, 921 F.3d 991, 1003-04 (11th Cir. 2019) (“We are not in the business of issuing advisory opinions that merely opine on what the law would be upon a hypothetical state of facts.”) (internal quotations omitted).

III. The Indictment Sufficiently Charged a Conspiracy to Violate the FCPA and a Substantive Violation of the FCPA.

A. *Snyder* was not an FCPA case and did not alter the elements of the FCPA.

As the defendants acknowledge, *United States v. Snyder* was not an FCPA case. 603 U.S. 1, 1 (2024). In *Snyder*, the Supreme Court held that the federal statute criminalizing “theft or bribery concerning programs receiving Federal funds,” criminalizes bribery and not gratuities. The *Snyder* Court went on to explain that bribes are “typically payments made or agreed to before an official act in order to influence the public official.” *Id.* (emphasis added). *Snyder* had nothing to do with the FCPA and therefore, as expected, the Supreme Court’s opinion is entirely silent on whether the FCPA criminalizes gratuities as well as bribes. The defendants seek to stretch the

holding of *Snyder* to encompass a statute not before the *Snyder* court.¹ But *Snyder* was not an FCPA case and its holding with regard to an entirely different statute — 18 U.S.C. § 666 — has no impact on the elements of the crimes charged in this case. See Report and Recommendation of United States Magistrate Judge Lisette M. Reid in *United States v. Wakil*, No. 21-cr-20406, 2023 WL 2898510, at *5 (S.D. Fla. 2023) (DE 94), report and recommendation adopted by United States District Judge Kathleen M. Williams (DE 100) (the defendant “fails to cite to a single case stating that where payment of a bribe is made after a payor had received the benefit of any bargain struck, no violation of the FCPA occurs. Nor has the Undersigned found any. Further, this argument is in tension with the FCPA’s language, broad application, and the facts alleged in the Indictment. As the Government notes the FCPA ‘contains no provision that the actual payment of a bribe must occur prior to business being awarded ... [and if Wakil’s] argument were true, this would create an outsized loophole that would allow bribe payment to occur so long as the payments were delayed.’”).

Additionally, and as set out in more detail below, because the indictment sufficiently pleads bribery conduct — a corrupt bargain predating the acts sought to be influenced — there is no basis for the court to issue an advisory opinion regarding whether the FCPA criminalizes gratuities. See *Johnson*, 921 F.3d at 1003-04. There is similarly no basis for dismissing the indictment. See *Poirier*, 321 F.3d at 1029.

B. The indictment alleges a corrupt bargain predating the acts sought to be influenced.

In an attempt to force this case into *Snyder*’s orbit, the defendants spend nearly seven pages arguing that the FCPA does not criminalize gratuities. DE 151 at 7-13. However, the court does

¹ The defendants also attempt to unduly narrow the ruling of *Snyder* focusing on the timing of the corrupt payment, rather than the timing of the corrupt agreement to pay. The holding in *Snyder* explicitly defines typical bribes as “payments made or agreed to before an official act in order to influence the public official.” *Snyder*, 603 U.S. at 1 (emphasis added).

not need to decide that issue for the simple reason that the instant case — as pled — does not rest on a “gratuities” theory. Though the defendants argue that the indictment is devoid of any evidence of a corrupt bargain (*id.* at 2), pages eleven through fifteen of the indictment make clear that the defendants have been charged with offering, paying, promising, and authorizing the payment of an approximately \$1 million bribe to a government official and laundering the proceeds thereof.

To wit, the indictment alleges that on March 31, 2016, the co-conspirators were already planning corrupt payments to defendant Bautista, the COMELEC official with ultimate decision-making authority to release payments under the contract. DE 12 at 11, ¶ 3. The indictment alleges that nearly two months later, on May 15, 2016, the co-conspirators created the first fake contract to paper over the bribe transfers. *Id.* at 12, ¶ 5. The indictment further alleges that nearly three months later, on August 10, 2016, the defendants communicated that there is still no resolution to the outstanding VAT calculation and payments being withheld by COMELEC. *Id.* at 13-14, ¶ 15. But just five days later, as alleged in the indictment, defendant Bautista authorized lowering the VAT from 12% to 5% and authorized release of over \$4 million in payments to the co-conspirators’ company. *Id.* at 14, ¶ 17. The indictment alleges that beginning that same day, August 15, 2016, defendants Piñate and Vasquez, while in the Southern District of Florida, take steps to initiate, direct, and effectuate \$1 million in bribery transfers to defendant Bautista. *Id.* at 14-15, ¶¶ 18, 19.

The indictment sets forth the required “plain, concise, and definite . . . statement of the essential facts constituting the offense charged” and cites the relevant statutes the defendants are alleged to have violated. Fed. R. Crim. P. 7(c)(1). Nothing more is required.

IV. Article 210 of the Philippine Revised Penal Code Satisfies the Requirements of Section 1956(c)(7)(B).

The defendants erroneously claim that Article 210 of the Philippine Revised Penal Code — entitled “direct bribery” — is not a permissible law to form the SUA supporting the money laundering conspiracy and substantive counts charged in the indictment. *See* DE 151 at 15. This

argument is built on a fundamentally flawed premise that the elements of the Philippine law SUA and “U.S. bribery law” must be coterminous — a position unsupported by any case law, contradicted by the plain language of 18 U.S.C. § 1956, and rejected by the only appellate court to evaluate the question directly. *See United States v. Chi*, 936 F.3d 888, 898 (9th Cir. 2019). Further, the indictment contains sufficient allegations that co-defendant Bautista was promised and received bribes in exchange for taking and not taking actions “relat[ing] to the exercise of his or her functions as a public officer,” as required by the relevant Philippine bribery law SUA. Ex. A at 5. Because the indictment pleads bribery conduct (as set out above) and the Philippine bribery law contains the necessary elements to serve as the money laundering SUA, there is no basis for dismissing the indictment.²

The specific Philippine law forming the SUA in this case satisfies the requirements under 18 U.S.C. § 1956(c)(7)(B) and therefore permissibly serves as the underlying crime generating the laundered proceeds in this case. Section 1956(c)(7)(B)(iv) defines the term “specified unlawful activity” to include “an offense against a foreign nation involving — bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official.” This subsection does not cite to or require conformity with any other U.S. federal law, therefore a plain reading and application of § 1956(c)(7)(B) include Article 210 of the Philippine Revised Penal Code.

² The defendants’ request for *in camera* review of the grand jury transcript ignores the fact that the indictment returned by the grand jury details the bribery conduct supporting the charges. This falls far short of the “compelling and particular need” required in order to infringe upon the long-established policy that grand jury proceedings in federal courts should be kept secret. *United States v. Aisenberg*, 358 F.3d 1327, 1349 (11th Cir. 2004). Nor does *United States v. Bravo-Fernandez* support their request. 239 F. Supp. 3d 411, 415 (D.P.R. Mar. 7, 2017). There, the district court based its decision to review the grand jury material on the fact that prior to the First Circuit’s decision invalidating a gratuity-based prosecution under § 666, there was “no reason to believe that it would be improper to premise [such a prosecution] on a gratuity theory.” *Id.* at 415-16. Because there is no similar circuit court opinion addressing the elements of the FCPA and because the facts pled support the bribery conspiracy and substantive count, *Bravo-Fernandez* is inapposite, and grand jury secrecy should not be disturbed.

The defendant in *United States v. Chi* similarly argued that a foreign bribery law — there a South Korean bribery law — was an impermissible SUA under § 1956(c)(7)(B). *See* 936 F.3d at 892 (rejecting defendant’s argument that because the foreign law did not identically track the elements of 18 U.S.C. § 201 it was an impermissible foreign bribery law SUA). The Ninth Circuit disagreed and held that a foreign bribery statute qualifies as an SUA under Section 1956(c)(7)(B) if it comports with the common meaning of “bribery of a public official” at the time Congress enacted § 1956. *See id.* at 893-96. The *Chi* court held that a foreign bribery statute may permissibly serve as a § 1956 SUA if it contains the following three elements: 1) two parties — one who paid, offered, or conferred the bribe and one who received, solicited, or agreed to accept it; 2) something given by the bribe-giver, including any benefit; and 3) something to be given by the bribe-taker, including the recipient’s decision, opinion, recommendation, vote or other exercise of discretion as a public servant, or a violation of a known legal duty as a public servant. *Id.* at 897.

The defendants attempt to argue that the relevant Philippine law fails to satisfy the three essential elements set out above. But the foreign law declaration signed by Deputy Ombudsman of the Philippines, Jose Mercado Balmeo, Jr., demonstrates that Article 210 contains these three elements. *See* Ex. A. Article 210, direct bribery, requires: i) the accused is a public officer; and ii) the accused has received directly or through another some gift or present offer or promise; and iii) that the gift, present or promise has been given (a) with a view to committing some crime; (b) in consideration of an act which is not a crime, but is nonetheless unjust; or (c) to refrain from something which is in the public officer’s duty to do; and (d) the act or omission relates to the

exercise of his or her functions as a public officer.³ *Id.* at 5. Article 210 satisfies the three “bribery” requirements as articulated by the *Chi* court; nothing more is required.

V. Conclusion

Because the indictment is sufficiently pled, the United States respectfully requests the Court deny the motion to dismiss.

Respectfully submitted,

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³ Article 212 of the Philippine revised penal code is the statute that holds accountable the individual offering the bribe under Article 210. *See* Ex. A at 6.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on May 14, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below in the manner specified.

/s/ Jil Simon
Jil Simon
DOJ Trial Attorney

SERVICE LIST

Party	Counsel
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CR-20343-KMW

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**ROGER ALEJANDRO PINATE MARTINEZ, and
JORGE MIGUEL VASQUEZ,**

Defendants.

_____ /

DECLARATION OF JOSE MERCADO BALMEO, JR.

1. I received my law degree from the University of Perpetual Help Rizal in 1998. I have been a member in good standing of the Integrated Bar of the Philippines since 1999.
2. Upon passing the Philippines Bar in 1999, I worked for the Public Attorney's Office. I held the position of Public Attorney II where I represented individuals accused of violations of Philippine law. In 2004, I joined the Office of the Special Prosecutor, Office of the Ombudsman. Under the constitution of the Republic of the Philippines the Office of the Ombudsman is the body responsible for investigating and prosecuting Philippine government officials accused of crimes, with a particular focus on graft and corruption-related offenses.
3. In my role as an Assistant Special Prosecutor, I handled cases involving violations of Philippine bribery laws. I retired from the Office of the Ombudsman in 2015, and I went into the private practice of law where I litigated criminal and civil matters.
4. I returned to the Office of the Ombudsman in September of 2018 where I held the position of Assistant Ombudsman. In this role, I reviewed the legal sufficiency of graft and corruption charges prior to filing charges in court.

5. I currently hold the position of Deputy Ombudsman of the Philippines overseeing the Military and Other Law Enforcement Office. The President of the Republic of the Philippines appointed me to this position in March of 2022. My term expires in 2029.

6. I have served as a speaker on matters involving Philippine bribery laws, including, presentations at the 2022 Asia-Pacific Economic Cooperation (APEC) Anti-Corruption and Transparency Experts Working Group, the 2018 United Nations Office on Drugs and Crime (UNODC) Global Expert Meeting on Corruption Involving Vast Quantities of Assets, and the 2014 Philippine Association for Government Budget Administration (PAGBA) Convention on Republic Act 3019 (Anti-Graft and Corrupt Practices Act).

7. A true and correct copy of my curriculum vitae is attached as Exhibit A.

8. I submit this Declaration to address the elements of crimes of bribery under Philippine law, which I understand serve as a predicate offense for certain of the crimes charged in the indictment in this case.

Republic Act No. 3019

9. Republic Act No. 3019, entitled The Anti-Graft and Corrupt Practices Act, is one of the primary anti-corruption laws in the Philippines, and prohibits specific acts of public officers that constitute or may lead to graft or corrupt practices. Section 3, titled *Corrupt practices of public officers*, includes eleven subparts setting out prohibited conduct, including the following:

b) Directly or indirectly requesting or receiving any gift, present, share, percentage, or benefit, for himself or for any other person, in connection with any contract or transaction between the Government and any other part, wherein the public officer in his official capacity has to intervene under the law.

* * *

e) Causing any undue injury¹ to any party, including the Government, or giving any private party any unwarranted benefits, advantage or preference in the discharge of his official administrative or judicial functions through manifest partiality,² evident bad faith or gross inexcusable negligence. This provision shall apply to officers and employees of offices or government corporations charged with the grant of licenses or permits or other concessions.

10. The elements of Section 3(b) of Republic Act of 3019 are:

- i. the offender is a public officer;
- ii. who requested or received a gift, a present, a share, a percentage, or benefit;
- iii. on behalf of the offender or any other person;
- iv. in connection with a contract or transaction with the government; and
- v. in which the public officer, in an official capacity under the law, has the right to intervene.³

11. The elements of Section 3(e) of Republic Act of 3019 are:

- i. the offender is a public officer;
- ii. the act was done in the discharge of the public officer's official, administrative or judicial functions;
- iii. the act was done through manifest partiality, evident bad faith, or gross inexcusable negligence; and
- iv. the public officer caused any undue injury to any party, including the Government, or gave any unwarranted benefits, advantage or preference.⁴

12. The penalty for violating Sections 3(b) or 3(e) is imprisonment for not less than six years and one month nor more than fifteen years, perpetual disqualification from public office, and confiscation or forfeiture in favor of the Government of any prohibited interest and unexplained wealth manifestly out of proportion to his salary and other lawful income.

¹ Undue injury is interpreted as actual damage. Undue means more than necessary, not proper, or illegal; and injury is any wrong or damage done to another, either in his or her person, rights, reputation or property. See *Virginia M. Gaudines v. Sandiganbayan*, G.R. No. 164891, June 6, 2011.

² "Partiality is synonymous with bias that excites a disposition to see and report matters as they are wished for, rather than as they are. Bad faith does not simply connote bad judgment or negligence; it imputes a dishonest purpose or some moral obliquity and conscious doing of a wrong; a breach of a sworn duty through some motive or intent or ill will; it partakes of the nature of fraud." *Sison v. People of the Philippines*, G.R. Nos. 170339, 1703398-403, March 9, 2010.

³ See *Cadio-Palacios v. People*, GR No. 168544, March 31, 2009.

⁴ See *Virginia M. Gaudines v. Sandiganbayan*, G.R. No. 164891, June 6, 2011.

13. Republic Act 3019 defines “public officers” as including elective and appointive officials and employees, permanent or temporary, whether in the classified or unclassified or exempt service receiving compensation, even nominal, from the government. The “government” includes the national government, the local governments, the government-owned and government-controlled corporations, and all other instrumentalities or agencies of the Republic of the Philippines and their branches.

14. These definitions of “public officers” are intended to be comprehensive and apply to every public servant at all levels of the Philippine government.

15. Private persons who make offers or promises or provide gifts to public officers under the various forms of bribery are subject to the same above-described penalties that may be imposed on public officers, except disqualification and suspension from office.

16. Philippine bribery laws do not provide quantitative thresholds or *de minimis* exceptions for what constitutes a bribe. Republic Act 3019 provides an exception for unsolicited gifts of “small or insignificant value” under certain circumstances, but this exception is not recognized under other laws and may not be invoked as a defense in prosecutions under any other provision.⁵

17. As a rule, the motive or intent of the person committing any of these forms of bribery is not considered. Rather, the mere performance of the prohibited act constitutes a violation of the law.

18. The above-described provisions of the Republic Act of 3019 were in force during the period relevant to the charges in the indictment, specifically beginning in or around May 2015 through in or around February 2018.

⁵ For example, this exception does not apply to bribery under Articles 210, 211, or 212 of the Penal Code.

Revised Penal Code

19. Additionally, Title Seven, Chapter Two, Section Two of the Revised Penal Code criminalizes three relevant types of bribery: (a) direct bribery (Article 210); (b) indirect bribery (Article 211); and (c) corruption of public officials (Article 212).

20. Article 210 - Direct bribery is committed by a public officer who accepts an offer or promise or receives a gift or present, by himself or through another, with a view to committing a crime, or in consideration of the execution of an act that does not constitute a crime but is unjust, or to refrain from doing something that it is his official duty to do. Under Article 210 the elements of the crime of direct bribery were:

- i. the accused is a public officer; and
- ii. the accused has received directly or through another some gift or present offer or promise; and
- iii. that gift, present or promise has been given:
 - a. with a view to committing some crime; or
 - b. in consideration of an act which is not a crime, but is nonetheless unjust; or
 - c. to refrain from something which is the public officer's duty to do; and
 - d. the relevant crime or act or omission relates to the exercise of his or her functions as a public officer.⁶

21. The Revised Penal Code imposes penalties upon public servants who accept bribes to commit crimes. The penalty for direct bribery is determined by the manner in which it is committed as detailed below.

22. If the bribe was paid with a view to committing a crime, the offense carries a term of incarceration of 8 years and 1 day to a maximum of 12 years' imprisonment, and a fine of not less than three times the value of the gift (*prision mayor* in its medium to maximum period).

23. If the bribe was paid in consideration of the execution of an act that does not constitute a crime, but is unjust, the offense carries between 2 years, 4 months and 1 day to 4

⁶ See *Pozar v. Court of Appeals*, No. L-62439, October 23, 1984.

years and 2 months' imprisonment, along with a fine of not less than two times the value of the gift (*prision correccional* in its medium period).

24. If the bribe was paid to refrain from doing something that is the public officer's duty to do, the offense carries a minimum of 4 years, 2 months and 1 day up to a maximum of 6 years' imprisonment, and a fine of not less than three times the value of the gift (*prision correccional* in its maximum period).

25. Article 211 - Indirect bribery is committed by a public officer who accepts a gift offered to him by reason of his office. Under Article 211 the elements of the crime of indirect bribery were:

- i. that the offender is a public officer;
- ii. that he accepts gifts; and
- iii. that the said gifts are offered to him by reason of his office.

26. The penalties for indirect bribery include imprisonment of between 2 years, 4 months and 1 day and 6 years (*prision correccional* in its medium to maximum period), suspension from office, and public censure.

27. Article 212 - Corruption of public officials is a crime committed by a private person who made the offers or promises or provided the gifts to the public officer.

- i. that the offender makes offers or promises or gives gifts or presents to a public officer; and
- ii. that the offers or promises are made or the gifts or presents given to a public officer, under circumstances that will make the public officer, under circumstances that will make the public officer liable for direct bribery or indirect bribery.

28. Article 203 of the Revised Penal Code defines "public officer" as any person who, by direct provision of law, popular election or appointment by competent authority, shall take part in the performance of public functions in the government of the Philippine Islands, or shall perform in said government or in any of its branches public duties as an employee, agent or subordinate official, of any rank or class.

29. The above-described provisions of the Revised Penal Code were in force during the period relevant to the charges in the indictment, specifically beginning on or about May 2015 through February 2018.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 7, 2025.



JOSE MERCADO BALMEO, JR.

EXHIBIT A

[RESUME]

JOSE M. BALMEO JR.
22 Uranus St., St. Dominic 8 Subd.,
Congressional QC



EDUCATION

Bachelor of Science Major in Management 1985
San Beda College, Manila

Units Earned 1988
Masters in Business Administration
University of Sto. Tomas, Manila

Bachelor of Laws 1998
University of Perpetual Help Rizal
Las Piñas, Manila

WORK EXPERIENCE

Administrative Assistant 1985-1988
Foodline Inc.
2302 Pasong Tamo Ext., Makati City

Proprietor 1988-1998
UZZO International Trade
30 Miller Ave., Quezon City

Public Attorney 1999-2004
Public Attorney's Office Manila District
Department of Justice
Padre Faura , Manila

Assistant Special Prosecutor 2004-2015
Office of the Special Prosecutor
Office of the Ombudsman
Agham Road QC

Private Practice of Law
J Balmeo Law Office

2015-2018

Assistant Ombudsman
Office of the Ombudsman

2018-2022

Deputy Ombudsman for the Military and
Other Law Enforcement Offices
And concurrent Overall Deputy Ombudsman for Cases

2022-to present

His experience in the field of Law started as Public Attorney with the Department of Justice handling Civil, Criminal , Labor and Administrative cases for clients who cannot afford to hire private counsel.

He then transferred to another government office as a prosecutor handling anti-graft cases of both high ranking and low ranking officials before the Sandiganbayan. For a brief moment, he left government service and engaged in the private practice of law, and then returned to the government again to the Office of the Ombudsman, as an Assistant Ombudsman and eventually was appointed as the Deputy Ombudsman for the Military and other Law Enforcement Offices (MOLEO) with a term of seven years , where he has jurisdiction over all armed personnel of the Philippines charged with either criminal or administrative cases.

He has likewise been designated as the Overall Deputy Ombudsman for Cases handling cases against low-ranking officials in the National Capital Region. In July 2022 in addition to his duties as Deputy Ombudsman he was named as Officer in Charge of the Prosecution, Information, Evaluation and Monitoring Services (PIEMS) Office.

He has also been designated four times as Officer-in Charge of the Office of the Ombudsman this was last August 2023, December 2023, March 2024 and August 2024. In addition, he was likewise designated as Office on charge of the Office of the Special Prosecutor last July 2024.

SEMINARS/ CONFERENCES :

April 2025

Delegate

WORLDBANK Global Forum on Partnerships for Anti-Corruption
Washington DC USA

March 2025

Delegate

OECD Global Anti-Corruption Integrity Forum
Paris , France

November 2024

Delegate

South East Asia Ombudsman Forum (SEAOFF)
Jakarta Indonesia

July 2024

Delegate

United Nations Conference against Corruption (UNCAC)
Vienna Austria

May 2024

Delegate

International Ombudsman Conference
The Hague

February 2024

Delegate

Regional UNCAC Convention
Bangkok , Thailand

September 2023

Delegate

International Ombudsman Conference
Rome Italy

February 2023
Delegate
1ST Senior Officer's Meeting APEC
Palm Springs California USA

January 2023
Delegate
International Ombudsman Conference
Istanbul Turkey

November 2022
Delegate
18th Principal's meeting of the ASEAN-Parties against Corruption
Cambodia

August 2022
Delegate
35th APEC Anti Corruption and Transparency Experts Working
Group (ACTWG) conference
Chiangmai, Thailand

November 2020
Resource Speaker on Republic Act 6713
Armed Force of the Philippines
OESPA Family Conference November 18, 2020

November 2019
Delegate
2nd Istanbul Conference International Ombudsman Conference
"Principles of Good Administration and Ombudsman" Istanbul
Turkey

December 2018

Resource Speaker The Philippine Experience

United Nations Office on Drugs and Crime (UNODC) Global Expert Meeting on Corruption Involving vast Quantities of Assets

Lima, Peru

November 2014

Resource Speaker on Republic Act 3019

Philippine Association for Government Budget Association (PAGBA) Convention

Puerto Princesa Palawan

November 2014

Resource Speaker on Republic Act 6713

Development Academy of the Philippines (DAP)

DAP Bldg., Ortigas Center, Pasig,

October -November 2014

Resource Speaker on Republic Act 3019, 6713 and ARTA Law

Anti Red Tape Act (ARTA) Manila International Airport Authority

Paranaque City

January -March 2013

Resource Speaker on Republic Act 3019 and Republic Act 6713

Department of Education (DEPED training)

Pagsanjan Laguna , and Tagaytay City

January 30, 2013

Resource Speaker on Investigating Techniques

Department of Public Works and Highways, National Capital

Region held at DPWH NCR Quezon City

October 2012

Resource Speaker Forfeiture and Anti Graft Laws

Training for Prosecutors in the Investigation And Prosecution of Financial Crimes Sponsored by the US and Philippine DOJ
Diamond Hotel, Manila

July 2011

Resource Speaker on Republic Act 3019

Financial Investigative Techniques Seminar

PNP Headquarters at Camp Crame QC sponsored by the US International Criminal Training Assistance Center Program and the US Internal Revenue Service (IRS).

March 2011

Resource Speaker, on Republic Act 1379 (Forfeiture) Asset Management Training and Technical Assistance Seminar for Judges, Prosecutors and Members of the Anti-Money Laundering Council held at the Hyatt Hotel, Manila sponsored by the US Department of Justice (US DOJ) and the US Marshall Service
Manila

2010

Delegate, US-Philippine Consultations under the Framework of Extradition and Mutual Legal Assistance Treaty held in Washington DC USA.

2009

Participant, Complex Financial and Investigations Course at the International Law Enforcement Academy (ILEA)
Bangkok Thailand