

G.R. No. 160261, G.R. No. 160262, G.R. No. 160263, G.R. No. 160277, G.R. No. 160292, G.R. No. 160295, G.R. No. 160310, G.R. No. 160318, G.R. No. 160342, G.R. No. 160343, G.R. No. 160360,

Title: Francisco Jr. v. The House of Representatives  
Facts: Etc.. November 10, 2003 (Case Brief / Digest)

This case pertains to the impeachment complaints filed against then Philippine Supreme Court Chief Justice Hilario G. Davide, Jr. in 2003. The impeachment process began when former president Joseph E. Estrada filed an impeachment complaint (first impeachment complaint) against the Chief Justice for “culpable violation of the Constitution, betrayal of the public trust and other high crimes.” This complaint was endorsed by several members of the House of Representatives and referred to the House Committee on Justice according to the constitutional process. The Committee on Justice ruled the first impeachment complaint as “sufficient in form” but eventually dismissed it for being insufficient in substance. This dismissal had not been reported to the House when after four months and three weeks, another impeachment complaint (second impeachment complaint) was filed which raised the question on whether the filing of such complaint fell within the one-year bar provided in the Constitution. This second complaint was filed by Representatives Gilberto C. Teodoro, Jr. and Felix William B. Fuentebella and was endorsed by at least one-third of all members of the House, which supposedly would initiate the trial in the Senate forthwith. Subsequent to the filing of this second complaint, various petitioners sought relief from the Supreme Court, alleging the unconstitutionality of the filing and arguing, among other grounds, that it violated the constitutional prohibition against the initiation of impeachment proceedings against the same official more than once within a period of one year.

Issues:

1. Whether the filing of the second impeachment complaint against Chief Justice Hilario G. Davide, Jr. violates the constitutional prohibition against the initiation of impeachment proceedings against the same official more than once within a period of one year.
2. Whether the filing of the second impeachment complaint complies with the requirements set forth in the Constitution and the House Impeachment Rules.
3. Whether judicial review of the impeachment proceedings is within the purview of the powers of the Philippine Supreme Court.

Court’s Decision:

The Supreme Court ruled that the initiation of the second impeachment complaint against Chief Justice Davide Jr. was unconstitutional as it violated the one-year bar provided in Section 3(5) of Article XI of the Constitution. The court differentiated between “initiation” and “filing” of impeachment complaints, holding that “initiation” occurs upon filing of the complaint and referral to the Committee on Justice, as happened with the first impeachment

G.R. No. 160261, G.R. No. 160262, G.R. No. 160263, G.R. No. 160277, G.R. No. 160292, G.R. No. 160295, G.R. No. 160310, G.R. No. 160318, G.R. No. 160342, G.R. No. 160343, G.R. No. 160360, Etc., November 10, 2003 (Case Brief / Digest)

complaint. The prohibition against initiation of impeachment proceedings against the same official more than once within a period of one year applied in this case, thus making the second impeachment complaint void. The court also ruled that it had the authority and duty to exercise judicial review over impeachment proceedings to ensure they are in conformity with the Constitution.

#### Doctrine:

In the 2003 cases *Francisco Jr. v. The House of Representatives et al.*, the Philippine Supreme Court enunciated that, “judicial power includes the duty of the courts of justice to settle actual controversies involving rights which are legally demandable and enforceable, and to determine whether or not there has been a grave abuse of discretion amounting to lack or excess of jurisdiction on the part of any branch or instrumentality of the government.” The Court has the power and the duty to uphold the Constitution, even in matters pertaining to impeachment proceedings.

#### Class Notes:

Key elements or concepts central to the case:

1. Judicial Review - The authority of the judiciary to determine whether acts of Congress and the executive branch are in accord with the Constitution.
2. Standing - Requires a personal and substantial interest in the case and a direct injury as a result of the questioned act.
3. Political Questions - Distinct from justiciable questions, often involving issues decided by the people in their sovereign capacity or for which full discretionary authority has been delegated to the legislative or executive branch. The Court has jurisdiction to review non-political questions that may arise during impeachment proceedings.
4. Impeachment Initiations - The constitutional prohibition against the initiation of impeachment proceedings against the same official more than once within a period of one year.
5. Section 3, Article XI, 1987 Philippine Constitution - Governs the impeachment process.

#### Historical Background:

The decision is an essential illustration of the dynamic interpretation of constitutional provisions on impeachment, particularly the one-year bar for the initiation of impeachment cases against an official. It serves as a historic pronouncement against potential abuses in the use of the impeachment process, affirming the role of the judiciary in maintaining the system of checks and balances essential to Philippine democracy. The case transpired under the administration of President Gloria Macapagal-Arroyo when political struggles and power

G.R. No. 160261, G.R. No. 160262, G.R. No. 160263, G.R. No. 160277, G.R. No. 160292, G.R. No. 160295, G.R. No. 160310, G.R. No. 160318, G.R. No. 160342, G.R. No. 160343, G.R. No. 160360, Etc.. November 10, 2003 (Case Brief / Digest)

dynamics were intense, especially involving the judiciary and the legislature. The case represents a crucial moment wherein the judiciary asserted its constitutional boundaries and clarified the process of impeachment to safeguard judicial independence from potential political exploitation.