

Title: Estate of Ferdinand E. Marcos, Imelda Romualdez Marcos, and Irene Marcos Araneta vs. Republic of the Philippines (Malacañang Jewelry Collection Forfeiture)

Facts:

The case pertains to the forfeiture of the Malacañang Jewelry Collection, which was allegedly accumulated by the Marcoses during their time in power. Civil Case No. 0141 was initiated on December 17, 1991, by the Republic through the Presidential Commission on Good Government (PCGG) for the recovery of assets believed to be ill-gotten wealth of Ferdinand Marcos and his family. The properties were clustered into 18 categories, with the jewelry, referred to as the “Malacañang Collection,” specifically mentioned under paragraph 9(6).

The Republic requested a Partial Summary Judgment on June 24, 2009, specifically targeting the Malacañang Collection. The alleged value was presented, and it was categorized into three collections, with the Malacañang Collection being the subject. The Republic argued that these assets were disproportionate to the Marcoses’ lawful income, and thus, ill-gotten.

The petitioners, represented by the estate of Ferdinand E. Marcos, Imelda Marcos, and Irene Marcos Araneta, denied the allegations and filed various motions and manifestations opposing the motion for summary judgment. Despite these, the Sandiganbayan issued a Partial Summary Judgment on January 13, 2014, ruling that the collection was subject to forfeiture. The Marcoses filed motions for reconsideration, which were denied. They then appealed to the Supreme Court.

Issues:

1. Whether the Sandiganbayan has jurisdiction over the properties.
2. Whether the Malacañang Collection can be the subject of the forfeiture case.
3. Whether forfeiture is justified under the Republic Act No. 1379.
4. Whether the Sandiganbayan correctly ruled that the Motion for Partial Summary Judgment was not inconsistent with the Request for Admission.
5. Whether the Sandiganbayan correctly declared that the forfeiture was not a deprivation of the petitioners’ right to due process of law.

Court’s Decision:

The Supreme Court affirmed the Sandiganbayan’s rulings that:

1. The Sandiganbayan acquired jurisdiction over the case.

2. The 1991 Petition sufficiently included the Malacañang Collection as subject to forfeiture.
3. Forfeiture was justified because the Marcoses' lawful income was grossly disproportionate to the value of the Malacañang Collection, thus presumed to be ill-gotten.
4. There was no inconsistency between the Motion for Partial Summary Judgment and the Request for Admission.
5. The right to due process was not violated as the Marcoses had numerous opportunities to present evidence of lawful acquisition, which they failed to do.

Doctrine:

The case reiterates the doctrine that property acquired by public officials which is manifestly disproportionate to their lawful income is presumed prima facie to have been unlawfully acquired.

Class Notes:

- In forfeiture cases, property manifestly disproportionate to lawful income is presumed ill-gotten (Republic Act No. 1379, Section 2).
- A Motion for Partial Summary Judgment may be granted if there are no genuine issues of fact, and matters are deemed admitted by virtue of failure to specifically deny (1997 Rules of Civil Procedure, Rule 35, Section 1, and Rule 26, Section 2).
- The right to due process is deemed satisfied by the opportunity to be heard and defend, even in procedural matters like summary judgment.

Historical Background:

The case represents the ongoing efforts of the Philippine government, post-Marcos regime, to recover alleged ill-gotten wealth amassed during the Marcos era. It reflects the legal mechanisms put in place to redress past abuses of power and corruption. The resolution contributes to the series of legal battles surrounding the Marcoses' wealth and the moral and legal initiatives to account for and recover assets for the benefit of the Philippine state and its citizens.