

Title:

****People of the Philippines v. Joseph Ejercito Estrada:**** On the Illegal Use of Alias and Banking Privacy

Facts:

On April 4, 2001, the Office of the Ombudsman filed two separate Informations against former Philippine President Joseph Ejercito Estrada. The first charged him with plunder, and the second with the illegal use of an alias, allegedly to conceal ill-gotten wealth acquired during his presidency. Specifically, the latter case, docketed as Crim. Case No. 26565, accused Estrada of using the alias “Jose Velarde” in various transactions with Equitable PCI Bank and other entities. Additionally, Estrada faced a third charge for perjury, incorporated later into the consolidated proceedings.

Estrada’s arrest followed the issuance of a warrant by the Sandiganbayan. Subsequent trial proceedings saw the presentation of evidence by the prosecution, centering on testimonies and banking documents purportedly linking Estrada to the alias “Jose Velarde.” After the prosecution rested its case, the defense filed a demurrer to evidence for the illegal use of alias and perjury charges, which the Sandiganbayan granted for these two cases, effectively dismissing them on the grounds stipulated in their July 12, 2004 Joint Resolution.

Issues:

1. The scope of Estrada’s indictment concerning the use of the alias “Jose Velarde.”
2. The alleged failure of the prosecution to prove Estrada’s commission of the offense.
3. The implications of existing laws on banking secrecy and alias use, specifically relating to the enforcement of Commonwealth Act No. 142 (as amended by R.A. 6085), R.A. 1405, and R.A. 9160.
4. Whether the Sandiganbayan erred in interpreting and applying these laws, particularly in dismissing the charges due to alleged insufficiencies in evidence and legal bases.

Court’s Decision:

The Supreme Court denied the petition, upholding the Sandiganbayan’s Joint Resolution that dismissed the illegal use of an alias charge against Estrada. The high court closely aligned its decision with the standards set forth in Commonwealth Act No. 142, as it had been interpreted in *Ursua v. Court of Appeals*, emphasizing that the law prohibits the habitual and public use of an alias not recognized by judicial or administrative authorities.

In addressing the legal issues, the Supreme Court highlighted:

- The evidence did not establish Estrada's public and habitual use of the "Jose Velarde" alias in a manner that violated CA No. 142.
- The transactions identified in the charges were significantly private and related to banking activities afforded confidentiality under existing laws, including R.A. No. 1405.
- The enactment of R.A. No. 9160, prohibiting anonymous and fictitious bank accounts, did not retrospectively incriminate activities that were previously lawful, including the use of pseudonyms in banking transactions that occurred before its passage.

Doctrine:

The case reiterates the principle that a charge for the illegal use of an alias under CA No. 142 should demonstrate the defendant's public and habitual use of said alias, beyond the confines of lawful, private transactions protected by banking confidentiality laws.

Class Notes:

- ****Illegal Use of Alias****: Charged under Commonwealth Act No. 142 as amended by R.A. 6085, requires the public and habitual use of an alias.
- ****Banking Secrecy****: R.A. No. 1405 protects the confidentiality of bank transactions, impacting the interpretation of "public use" of an alias in banking scenarios.
- ****R.A. No. 9160****: Acknowledges the legal allowance for anonymous or pseudonymous banking transactions prior to its enactment, thus influencing the understanding of prior conduct under CA No. 142.

Historical Background:

The case came into prominence amid broader allegations of corruption against Joseph Ejercito Estrada, who was then the President of the Philippines. The charges of illegal use of an alias were part of a series of legal battles that led to Estrada's impeachment, trial, and eventual ouster from office. The legal contests surrounding Estrada's presidency and post-presidency periods have significantly contributed to the political and legal discourse in the Philippines, particularly concerning corruption, accountability, and the intersection of banking privacy laws with anti-corruption measures.