

****Title:**** Grant of Post-Employment and Survivorship Benefits to the Late Former Chief Justice Renato C. Corona: An Equitable Resolution by the Supreme Court

****Facts:****

The case revolves around Mrs. Ma. Cristina Roco Corona's request for the release of retirement and other benefits due to her late husband, former Chief Justice Renato C. Corona, following his removal from office through impeachment. Chief Justice Corona was impeached by the Senate in 2012 for alleged betrayal of public trust and culpable violation of the Constitution, primarily due to his failure to disclose his Statement of Assets, Liabilities, and Net Worth (SALN). Despite his impeachment and the filing of separate criminal charges against him, which were dismissed upon his death in 2016, Mrs. Corona sought the grant of her husband's retirement benefits and a survivorship pension for herself under Republic Act No. 9946 and Administrative Circular No. 81-2010. The Supreme Court deliberated on whether Mrs. Corona was entitled to these benefits despite the impeachment of her late husband.

****Issues:****

1. Does the effect of an impeachment judgment extend to the forfeiture of retirement benefits and other emoluments?
2. Is an impeached public officer whose civil, criminal, or administrative liability was not judicially established considered involuntarily retired, thus entitling their beneficiaries to retirement benefits?
3. Is Mrs. Corona entitled to survivorship pension benefits under RA 9946 despite her husband's ouster through impeachment?

****Court's Decision:****

The Supreme Court, in granting Mrs. Corona's plea, held that the effects of an impeachment judgment are confined to removal from office and disqualification from holding any public office under the Republic of the Philippines, without extending to the forfeiture of retirement benefits. It reasoned that since Chief Justice Corona's civil, criminal, or administrative liability was not judicially established, he could be considered involuntarily retired, making his beneficiaries entitled to retirement benefits. The Court also ruled that Mrs. Corona is entitled to the survivorship pension benefits under RA 9946, highlighting the humanitarian purpose behind retirement laws and the absence of a legal basis to deny these benefits.

****Doctrine:****

The Supreme Court asserted the principle that impeachment is a political process limited to the removal and disqualification from public office, and does not automatically entail the forfeiture of retirement benefits. It also reiterated the legal maxim that laws are to be interpreted liberally in favor of the beneficiaries of retirement laws to serve their humanitarian purpose and ensure justice and equity.

****Class Notes:****

- Impeachment in the Philippines: Only extends to removal from office and disqualification from holding public office, without implicating forfeiture of retirement benefits.
- Eligibility for Retirement Benefits: An impeached official without judicially established liability is entitled to benefits, reflecting liberal interpretation in favor of beneficiaries.
- Survivorship Pension: The widow of a justice or judge who had retired or was eligible for retirement at the time of death is entitled to survivorship benefits under RA No. 9946.

****Historical Background:****

The case of former Chief Justice Renato C. Corona is situated within a complex historical context involving political tensions, legal intricacies surrounding impeachment proceedings, and the principle of justice and equity in the administration of retirement laws. It illustrates the challenging interplay between constitutional mechanisms for accountability, such as impeachment, and legal provisions designed to protect the welfare of public servants and their families, emphasizing the Supreme Court's role in interpreting these laws equitably.