

Title: Estrada vs. Desierto, et al.

Facts: The pivotal legal saga commenced with President Joseph E. Estrada facing allegations of corruption, which led to a series of events concluding with his ouster and the succession of Vice President Gloria Macapagal-Arroyo to the presidency. This sequence of events includes the explosive revelation by Governor Luis “Chavit” Singson about Estrada’s alleged involvement in illegal gambling profits, the subsequent “I accuse” speech by Senator Teofisto Guingona, Jr., and the initiation of an impeachment trial against President Estrada. Despite the airing of substantial allegations and evidence during the impeachment proceedings, the trial was abruptly ended by a walkout of the prosecution panel after the Senate, sitting as an impeachment court, voted against the opening of a crucial envelope alleged to contain incriminating evidence against Estrada. This move sparked massive protests, leading to widespread calls for Estrada’s resignation, culminating in his leaving the Malacañang Palace and Vice President Gloria Macapagal-Arroyo taking her oath as the President of the Philippines. Estrada later filed petitions contesting his ouster and maintaining that he did not resign but was merely unable to govern temporarily. His petitions raise crucial issues regarding the constitutionality of his removal and the legitimacy of Arroyo’s presidency.

Issues: The Supreme Court was confronted with various legal issues, including whether Estrada resigned or should be deemed resigned; the admissibility of evidence such as the Angara Diary, newspaper accounts relating to Estrada’s resignation and the legitimacy of Arroyo’s presidency; the propriety of Congress in deciding Estrada’s incapacity to govern; the implications of pre-trial publicity on Estrada’s right to a fair trial; and questions surrounding Estrada’s claim to immunity from suit.

Court’s Decision: The Court, in its en banc resolution, denied Estrada’s motions for reconsideration, upholding its earlier decision recognizing Gloria Macapagal-Arroyo as the legitimate President of the Philippines. The Court found that:

- Estrada effectively resigned from his post, as evidenced by his actions and the totality of events leading to Arroyo’s oath-taking.
- The admission of the Angara Diary and other pieces of evidence did not violate the rules on evidence.
- Estrada’s inability to govern, as decided by Congress, falls outside the ambit of judicial review due to its political nature.
- Prejudicial publicity did not impair Estrada’s right to a fair trial.
- Estrada’s claim to absolute immunity from suit does not extend beyond his presidency, and

he can thus be held accountable for acts committed during his tenure.

- The request for recusation of the members of the Supreme Court who attended Arroyo's oath-taking was without merit.

Doctrine: This case reiterates the doctrine that a President's resignation can be determined not only by explicit words but also by conduct demonstrating the intent to resign. It also underscores that impeachment proceedings do not preclude subsequent prosecution and that claims of prejudicial publicity must be substantiated by clear and convincing evidence showing actual prejudice.

Class Notes:

1. Resignation of a Public Official: Can be expressed through actions and circumstances, not just through explicit statements.
2. Political Questions: Issues related to the capacity to govern and decisions of Congress in this regard are political questions beyond judicial review.
3. Evidence: Admissions by a party, including entries in diaries and media reports, may be admissible under certain circumstances.
4. Prejudicial Publicity: Allegations of prejudicial publicity must show actual bias, not just the possibility of prejudice, due to widespread media coverage.
5. Immunity from Suit: A non-sitting President is not entitled to absolute immunity from suit for actions done while in office.

Historical Background: Estrada vs. Desierto et al. reflects the Philippines' turbulent political history marked by people power revolutions and the supreme legal authority of the Constitution over the political stakes involved in the presidency. It underscores the fundamental principle that sovereignty ultimately resides in the people and their collective will to maintain a democratic and constitutional order.