

Title: **Republic of the Philippines vs. Honorable Sandiganbayan, Ferdinand E. Marcos** (represented by his estate/heirs: Imelda R. Marcos, Maria Imelda Marcos-Manotoc, Ferdinand R. Marcos, Jr., and Irene Marcos-Araneta), and Imelda Romualdez Marcos

Facts: This case involves the forfeiture of Swiss deposits held in escrow at the Philippine National Bank (PNB), amounting to approximately US\$658,175,373.60 as of January 31, 2002. The Republic of the Philippines petitioned for the forfeiture of these funds, alleging they were ill-gotten wealth accumulated by former President Ferdinand E. Marcos, his family, and associates during his regime. After a series of motions and a decision by the Sandiganbayan, the case was elevated to the Supreme Court. The Marcos heirs filed motions for reconsideration against the Supreme Court's decision dated July 15, 2003, which had ordered the forfeiture of the Swiss funds in favor of the Republic. They argued that they were denied due process, and that the proceedings under Republic Act No. 1379 were criminal/penal in nature, thus requiring proof beyond a reasonable doubt. They further contended that summary judgment could not be rendered in forfeiture proceedings and that their rights under RA 1379 were violated. The Supreme Court's decision involved complex legal arguments concerning the nature of forfeiture proceedings, due process, and the application of summary judgment.

Issues:

1. Whether the forfeiture proceedings under RA 1379 are criminal in nature, thus entitling the Marcos heirs to full criminal procedural rights.
2. Whether the Marcos heirs were denied due process.
3. The propriety of summary judgment in forfeiture proceedings under RA 1379.

Court's Decision: The Supreme Court denied the motions for reconsideration with finality. It clarified that forfeiture proceedings under RA 1379 are civil, not criminal, in nature. It further ruled that due process was observed, highlighting that the Marcos heirs were given ample opportunity to present their case and defenses throughout the various stages of litigation. The Court also maintained that summary judgment was applicable and appropriate in the forfeiture proceedings, given the absence of a genuine issue of material fact.

Doctrines:

1. Forfeiture proceedings under RA 1379 are civil in nature. Thus, they require only a preponderance of evidence and do not afford the respondent the same protections as in criminal proceedings.

2. Due process is satisfied when the parties are afforded a reasonable opportunity to be heard and submit evidence in their defense.
3. Summary judgment is applicable in civil actions, including forfeiture proceedings under RA 1379, when there is no genuine issue of material fact, thereby expediting the resolution of cases without trial.

****Class Notes:****

- Civil vs. Criminal Proceedings: Forfeiture under RA 1379 is civil, focusing on the recovery of ill-gotten wealth, and does not penalize the respondent criminally.
- Due Process: Entails both substantive and procedural aspects. Substantive due process relates to the inherent fairness of the law, while procedural due process involves the procedures followed by the court.
- Summary Judgment: A procedural tool used for the prompt resolution of cases where no genuine issue of material fact exists, applicable in civil cases, including forfeiture proceedings.
- Burden of Proof: In civil cases, the standard is preponderance of evidence, unlike in criminal cases where it is beyond a reasonable doubt.

****Historical Background:**** The case against the Marcoses for the forfeiture of ill-gotten wealth is a part of the broader efforts to recover assets unlawfully acquired during Ferdinand E. Marcos's presidency in the Philippines. This case, among others, reflects the legal challenges and complexities involved in addressing allegations of corruption and ill-gotten wealth from historical regimes.