

Title: Chief Justice Renato C. Corona vs. Senate of the Philippines Impeachment Court, et al.

Facts:

1. **Initiation of Impeachment:** On December 12, 2011, a verified impeachment complaint against Chief Justice Renato C. Corona was presented and quickly endorsed by 188 Members of the House of Representatives (HOR), meeting the required one-third vote.
2. **Transmission to Senate:** The complaint was transmitted to the Senate on December 13, 2011, which convened as an impeachment court the next day.
3. **Service of Complaint:** Corona received the impeachment complaint on December 15, 2011, which included charges of culpable violation of the Constitution, betrayal of public trust, and graft and corruption under eight articles.
4. **Articles of Impeachment Detailed:**
 - **Article I:** Partiality and subservience in cases involving the Arroyo Administration.
 - **Article II:** Failure to disclose the Statement of Assets, Liabilities, and Net Worth (SALN).
 - **Article III:** Not meeting standards of competence, integrity, probity, and independence.
 - **Article IV:** Disregarding the separation of powers.
 - **Article V:** Disregarding the principle of res judicata on cases involving newly created cities and the promotion of Dinagat Island.
 - **Article VI:** Investigating a Justice of the Supreme Court improperly.
 - **Article VII:** Partiality in granting a Temporary Restraining Order to the Arroyo family.
 - **Article VIII:** Failing to account for Judiciary Development Fund (JDF) and Special Allowance for the Judiciary (SAJ).
5. **Petitioner's Answer and Media Campaigns:**
 - Corona filed his Answer on December 26, 2011, denying charges and criticizing the impeachment process.
 - Media disclosures by the prosecution led to public discussion about Corona's properties, despite Senate rules against public comments on pending impeachment trials.
 - Five petitions filed with the Supreme Court sought to enjoin the trial on grounds of improper verification and lack of due process.
6. **Impeachment Proceedings Begin:** The impeachment trial commenced on January 16, 2012.
 - Corona's motion for preliminary hearing was denied.

- Testimonies and submission of SALNs by various officials occurred.

7. **Rulings on Evidence:**

- On January 27, 2012, the Impeachment Court ruled to allow evidence for paragraphs 2.2 and 2.3 but not 2.4 (ill-gotten wealth) in Article II of the Impeachment Complaint.
- On February 6, 2012, the court issued subpoenas for bank officers to testify about Corona's alleged bank accounts.

8. **Petition and Supplement before Supreme Court:**

- On February 8, 2012, PSBank filed a petition for certiorari and prohibition (G.R. No. 200238) to enjoin the implementation of the subpoenas.
- Same day, Corona filed the present petition claiming grave abuse of discretion by the Impeachment Court and violation of due process rights.

9. **TRO and Additional Filings:**

- The Supreme Court issued a TRO in G.R. No. 200238 enjoining the Senate from implementing the Resolution and subpoena.
- On February 13, 2012, Corona filed a Supplemental Petition alleging due process violations by certain Senator-Judges.

Issues:

1. **Impeachment Complaint's Validity:** Whether the impeachment complaint was constitutionally infirm for lack of probable cause.
2. **Charges in Article II:** The appropriateness of allowing evidence on charges of graft and unexplained wealth in Article II.
3. **Bank Account Subpoenas:** Legality of subpoenas issued for the production of Corona's bank documents under the confidentiality provisions of the Foreign Currency Deposits Act.
4. **Due Process in Impeachment:** Whether Corona's right to due process was violated during the impeachment process.
5. **Judicial Review:** Extent of the Supreme Court's power to review impeachment proceedings for grave abuse of discretion.

Court's Decision:

1. **Mootness:** The Supreme Court dismissed the petition on the ground of mootness after Corona's conviction and ouster by the Senate, rendering the constitutional issues raised non-justiciable.
2. **Judicial Review Limitation:** The court emphasized that impeachment is a political

process outside its domain unless actions are tainted with grave abuse of discretion.

****Doctrine:****

- ****Impeachment as a Political Process:**** Impeachment decisions primarily rest within the legislative domain, and judicial intervention is limited to cases of grave abuse of discretion amounting to lack or excess of jurisdiction.
- ****Confidentiality of Foreign Currency Deposits:**** The confidentiality provision of financial records under Foreign Currency Deposits Act remains strict, emphasizing protection unless overridden by superior public interest in cases like impeachment.

****Class Notes:****

- ****Impeachment Grounds:**** Culpable violation of the Constitution, betrayal of public trust, and graft and corruption (Sec. 2, Art. XI, Philippine Constitution).
- ****Public Officer's SALN Disclosure:**** Requirement under Art. XI, Section 17 of the 1987 Constitution.
- ****Judicial Review:**** Permissible for grave abuse of discretion in political processes (Francisco v. Nagmamalaskit; Gutierrez v. HOR Committee on Justice)
- ****Confidentiality of Foreign Currency Accounts:**** Governed by RA 6426, sec. 8 and its exceptions under specific judicial considerations.

****Historical Background:****

- ****Context:**** The impeachment of Chief Justice Renato Corona occurred against the backdrop of contentious political relations between the Executive and Judiciary. Following President Benigno Aquino III's criticisms over judicial decisions perceived to protect former President Gloria Macapagal-Arroyo, the impeachment was seen by many as politically influenced.
- ****Political Environment:**** The rapid endorsement and transmission of the impeachment complaint indicated significant tensions, and the trial was marked by high public and media engagement, raising questions regarding judicial independence and separation of powers in the Philippines.