

REPUBLIC OF THE PHILIPPINES
HOUSE OF REPRESENTATIVES
QUEZON CITY, METRO MANILA

**IN THE MATTER OF THE
IMPEACHMENT OF THE VICE-
PRESIDENT OF THE REPUBLIC OF
THE PHILIPPINES,**

SARA ZIMMERMAN DUTERTE,
Respondent.

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VERIFIED COMPLAINT FOR IMPEACHMENT

We, the undersigned Complainants, as the duly elected Representatives of the people comprising at least one-third (1/3) of the members of the House of Representatives of the 19th Congress of the Philippines, under oath, do hereby file this complaint for the impeachment of **Sara Zimmerman Duterte**, incumbent Vice-President of the Republic of the Philippines, based on the grounds of **Culpable Violation of the Constitution, Betrayal of Public Trust, Graft and Corruption, and Other High Crimes**, and state:

NATURE OF THE COMPLAINT/RESOLUTION

1. We are filing this Complaint under, and pursuant to the provisions of Sections 2 and 3, Article XI (Accountability of Public Officers) of the *1987 Constitution of the Republic of the Philippines* (“*1987 Constitution*”).

2. Respondent’s impeachment is being initiated in accordance with Section 3, paragraph 4, Article XI of the *1987 Constitution*, as well as Section 2 (c), Rule II and Section 14, Rule IV of the *Rules of Procedure in Impeachment Proceedings of the House of Representatives of the 19th Congress*.

THE PARTIES

3. We, the Complainants, are all Filipinos and all of legal age. As duly-elected and incumbent Members of the House of Representatives of the 19th Congress, we bring this action for and on behalf of the Filipino People. We may be served with notices, orders, pleadings, and/or other processes at the House of Representatives, Constitution Hills, Batasan Complex, Quezon City, in connection with the instant Verified Complaint for Impeachment.

4. Respondent Sara Zimmerman Duterte (hereafter, “respondent Duterte”) is Filipino, of legal age, married, and the incumbent Vice-President of the Republic of the Philippines. She maintains office at the 11th Floor Cybergate Plaza, EDSA corner Pioneer Street, Mandaluyong City 1550, Metro Manila, where she may be served with notices, orders, pleadings and other processes in connection with this Verified Complaint for Impeachment.

STATEMENT OF FACTS AND ARTICLES OF IMPEACHMENT

5. On July 1, 2022, respondent Duterte assumed the duties and responsibilities of the Vice-President of the Republic of the Philippines.

5.1. On June 19, 2022, prior to her assumption in office, and in accordance with the Constitution,¹ respondent Duterte took her Oath of Office and swore that she will “*faithfully and conscientiously fulfill [her] duties as Vice-President of the Philippines*” and committed herself to “**[p]reserve and defend its Constitution, execute its laws, do justice to every man, and consecrate herself (myself) to the service of the Nation.**”

6. Before her election and assumption in office as Vice-President, respondent Duterte occupied the following public offices:

¹ CONST., art. VII, § 5.

Position	Term/Period
Vice-Mayor of Davao City	2007-2010
Mayor of Davao City	2010-2013 2016-2019 2019-2022

7. However, within less than three (3) years since having assumed the Vice-Presidency, which is the **second highest executive office in the country**, respondent Duterte has repeatedly, egregiously, and grossly violated her solemn oath. Indeed, respondent Duterte **pursued actions that amount to Culpable Violations of the Constitution, Flagrant Betrayal of Public Trust, Graft and Corruption, and other High Crimes.** These actions reveal that respondent Duterte is **unfit** for public office, and must, therefore, be removed by impeachment.

8. It has also been discovered that the actions of respondent Duterte as Vice-President are nothing new: she has acted in a similar, if not the same manner, ever since she assumed positions in public office. The only difference is, in previous occasions, she had successfully hidden her actions from public view. **No more.** The undersigned Members of the House of Representatives, comprising at least one third (1/3) of the Lower Chamber of the 19th Congress, and as representatives of the Filipino People, cannot, and will not – remain silent nor remain indifferent.

GROUND FOR IMPEACHMENT

ARTICLE I

Respondent Betrayed The Public Trust, Committed Culpable Violations of The Constitution And/Or Committed High Crimes In Contracting An Assassin And Plotting To Murder Or Assassinate The Incumbent President, The First Lady, And Speaker Of The House Of Representatives, As Publicly Admitted By Her In A Live Broadcast.

ARTICLE II

Respondent Betrayed The Public Trust And/Or Committed Graft And Corruption In Her Misuse and Malversation Of Confidential Funds Appropriated To The Office Of The Vice President (“OVP”) And The Department Of Education (“DepEd”).

ARTICLE III

Respondent Betrayed The Public Trust And/Or Committed Bribery And/Or Other Acts Of Graft And Corruption In Violation of Republic Act No. 3019.

ARTICLE IV

Respondent Committed Culpable Violations Of The Constitution And/Or Betrayal Of Public Trust In Amassing Unexplained Wealth And Failing To Disclose All Her Properties And Interests In Properties In Her Statement Of Assets And Net Worth ("SALN"), In Violation Of Section 17, Article XI Of The 1987 Philippine Constitution.

ARTICLE V

Respondent Committed Other High Crimes, Including The High Crime of Murder And Conspiracy To Commit Murder.

ARTICLE VI

Respondent, By Herself And/Or In Concert With Others, Committed Acts Of Destabilization Constituting, At Least, A Betrayal Of Public Trust And/Or Culpable Violations Of The Constitution, And Even The High Crimes Of Sedition And Insurrection.

ARTICLE VII

The Totality Of Respondent's Conduct As Vice-President, Including Her Commission Of The Foregoing Acts, Clearly Display Conduct Constituting A Betrayal Of Public Trust, Culpable Violations of the 1987 Constitution, and Graft and Corruption.

DISCUSSION

ARTICLE I: Respondent Betrayed The Public Trust, Committed Culpable Violations Of The Constitution And/Or Committed High Crimes In Contracting An Assassin And Plotting To Murder Or Assassinate The Incumbent President, The First Lady, And Speaker Of The House Of Representatives, As Publicly Admitted By Her In A Live Broadcast.

9. Respondent Duterte resorted to threats of bodily harm and, worse, assassination against key officials of the Philippine Government and their family members, particularly the sitting President, Ferdinand “Bong-Bong” Marcos, Jr. (“President Marcos Jr.”).

10. The nation watched in horror and shock when, in a virtual press conference conducted by respondent Duterte and her Chief of Staff, Atty. Zuleika T. Lopez (“Lopez”), in the early morning of November 23, 2024, respondent Duterte publicly and brazenly declared that she had contracted an unnamed person to kill the President, the First Lady, and the Speaker of the House of Representatives in the event of her death, with clear instructions for the said “assassin” to persist until these persons were dead.² “No joke, no joke,” she said:

“Ah wag ka mag-alala ma’am sa security ko, kasi may kinausap na ako na tao. **Sinabi ko sa kanya, kapag pinatay ako, patayin mo si BBM, si Liza Araneta at si Martin Romualdez.** No joke, no joke. Nagbilin na ako, ma’am. **Pag namatay ako, sabi ko, wag kang tumigil ha hanggang hindi mo mapatay po sila.** And then he said, **yes.**”

11. The foregoing statements of respondent Duterte admit two (2) things – *First*, that she has specifically directed a person to kill the President, the First Lady, and the Speaker of the House of Representatives, and *Second*, that the contracted person has already agreed to carry out her instruction. **In other words, there is a contract to kill.**

12. That her instruction supposedly included a suspensive condition – her death – which will trigger the contracted person to proceed with the assassination does not detract from the fact that respondent Duterte, a sitting Vice-President, has ordered and contracted a person to kill the sitting President.

13. These statements, which came in the heels of respondent Duterte’s prior disclosure that she had previously found herself wanting to behead the President,³ so alarmed the

² A copy of the entire recording entitled, “Live: VP November 23 PressCon At The Batasan” and the relevant clip at 1:16:45 to 1:17:15 downloaded from the Facebook account of Harry Roque available at https://www.facebook.com/story.php?story_fbid=417268981454224&id=100044166353035&mibextid=wwXlfr&rdid=6h6XziSmunk7qWJE, is attached as **Annex “A”**. See also Sara Duterte: If I get killed, so will Marcos, Liza Araneta, Romualdez, 23 November 2024. You Tube. <https://www.youtube.com/watch?v=WkOGL53JhKA>.

³ *VP Sara says She imagined “chopping off” Marcos’ head.* Manila Bulletin YouTube. <https://www.youtube.com/watch?v=LLkbhYY08zk>

nation that it was immediately treated as an “active threat”, prompting the Presidential Security Command to heighten the security of the President, and led the National Bureau of Investigation to immediately commence an investigation.

14. In fact, the news of a sitting Vice-President, spewing expletives and publicly admitting that she has set in motion a clear plot to assassinate the sitting President was so outrageous and unprecedented that it made its way around the globe with news outlets from various countries, including Al Jazeera,⁴ CBS News,⁵ CNN,⁶ Reuters,⁷ Hindustan Times,⁸ and Bangkok Post⁹ reporting on the matter. Plainly too, it was an international embarrassment to have a Vice-President behaving in such a manner. Worse, the chilling words of respondent Duterte had a profound effect on investor confidence.

15. This admission, as to having contracted a person for the purpose of assassinating the sitting President, President Marcos, Jr., his wife, and first cousin, the incumbent Speaker of the House of Representatives, has never been denied nor retracted by respondent Duterte, who instead repeatedly confirmed such admission, such as in her subsequent interview held on 26 November 2024:

“SZD: Pag namatay ako, I already asked a person to take revenge against two, three individuals. So. My question now to the administration – is revenge from the grave a crime?

Reporter: So, but **you already talked to a person?**

SZD: **Yes.**

⁴ *Philippines VP Sara Duterte threatens Marcos assassination if she is killed*. Aljazeera. 23 November 2024. See: <https://www.aljazeera.com/news/2024/11/23/philippines-vp-sara-duterte-threatens-marcos-assassination-if-she-is-killed>

⁵ *Philippines vice president publicly threatens to have nation's president assassinated*. CBS News. 23 November 2024. See: <https://www.cbsnews.com/news/sara-duterte-ferdinand-marcos-jr-philippines-assassination-threat/>

⁶ *Philippines vice president says she would have Marcos assassinated if she is killed*. CNN. 23 November 2024. See: <https://www.cnn.com/2024/11/23/asia/philippines-duterte-marcos-intl-hnk/index.html>

⁷ *Philippines boosts security after VP's assassination threat against president*. Reuters. 24 November 2024. See: <https://www.reuters.com/world/asia-pacific/philippine-vp-says-she-would-have-marcos-assassinated-if-she-is-killed-2024-11-23/>

⁸ *Philippine VP Sara Duterte makes big statement. She says, 'If I die...'*. Hindustan Times. 23 November 2024. See: <https://www.hindustantimes.com/world-news/philippine-vp-sara-dutertes-big-statement-death-assassination-threat-president-marcos-101732360677124.html>

⁹ *Philippine VP's assassination threat against president 'affects national security'*. Bangkok Post. 24 November 2024. See: <https://www.bangkokpost.com/world/2907805/uproar-over-philippine-vps-assassination-threat-against-president>

Reporter: **To do that, in the event that you are killed?**

SZD: **Yes, yes, yes.**

Reporter: So that much is clear?

SZD: Yes. So I have to die first. They have to kill me first. They have to kill me first, so now they can't kill me anymore. **Unless they want to die.**"¹⁰

16. To state that the acts of respondent Duterte undermines peace and order is an understatement. They are destabilizing, and forward unconstitutional means to remove an elected President from power, in contravention of the most fundamental principle in the 1987 Constitution declaring the Philippines as a democratic state where government authority emanates from the people¹¹ – and cannot be obtained through violent means. It suggests that the President and the Speaker of the House of Representatives, two (2) of the highest officials of the land, can so easily be removed from office and eliminated through unconstitutional means and violence by another public official. It is an apparent demonstration of illicit power. The absolute atrocity of these words cannot be mollified by the convenient excuse that these are mere threats akin to warnings. They are tantamount to High Crimes¹² and/or Betrayal of Public Trust¹³ and/or Culpable Violations of the 1987 Constitution.

17. Notably, respondent Duterte's resort to death threats against President Marcos, Jr., and her act of contracting an assassin to carry out such threat, was also backed up by her father, former President Rodrigo R. Duterte. On November 25, 2024, or a mere few days after respondent Duterte gloated about having a "contract to kill" in place against President Marcos, Jr., her father also issued a call to the military and police to intervene and prodded them to support respondent Duterte and not

¹⁰ 'I have to die first': Sara Duterte explains condition of 'revenge' plot vs Marcoses. You Tube. <https://www.youtube.com/watch?v=h8gaE4azqEo>

¹¹ Section 1, Article II of the 1987 Constitution states: Section 1. The Philippines is a democratic and republican State. Sovereignty resides in the people and all government authority emanates from them.

¹² As seen from the *Journal of the Constitutional Commission*, "High Crimes" pertain to indictable offenses that would render an official **unworthy to remain in office**, and refer to those acts or omissions **punishable by law**, which are **of such enormous gravity that they strike at the very life of the orderly working of government**. [*Journal of the Constitutional Commission*, Vol. No. 040 (26 July 1986) and 041 (28 July 1986)]

¹³ "Betrayal of Public Trust" refers to conduct that **betrays public interest, tyrannical abuse of power**, cronyism, or such other conduct that renders a government official unfit to continue in office or to wield the powers and prerogatives of an office. [*Gutierrez v. House of Representatives Committee on Justice*, 658 Phil 322 (2011)]

President Marcos, Jr. whom he libelously referred to as a “drug addict”, in a clear attempt to prompt a *coup d’etat* against the sitting administration:

“So, another appropriate question would be...yung..ito with sincerity, kayo bang mga military and police. Would you still continue to support a drug addict? Alam ninyo kung ano...tanungin mo lang iyong, Presidential Security Command, puro military man na. You need not go far. Iyang mga tao ninyo sa military. Hanggang kailan kayo magsuporta ng drug addict na Presidente.”¹⁴

18. The inflammatory words of respondent Duterte and those acting in concert with her were made in open defiance of the executive power that is vested in the President under the Constitution as well as his authority as the Commander-in-Chief of the Armed Forces. Such words and acts go against the 1987 Constitution, including Section 1, Article XI,¹⁵ Section 1, Article VII,¹⁶ and Section 18, Article VII,¹⁷ and thus amount to culpable violations of the Constitution. They are also clearly seditious¹⁸ and constitute an act of terrorism, among other crimes.¹⁹

19. Taken together, the foregoing are High Crimes that render respondent Duterte unfit to remain in office. These are crimes that strike at the very life of the orderly working of government — and, quite literally, the lives of those she threatened to assassinate.

19.1. Indeed, the declaration that a threat of an assassin hovers over the President, the First Lady, and the Speaker of the House of Representatives is seditious. It is an act of hate or revenge upon the person of a public officer.

19.2. These words also constitute an act of terrorism. The language employed by respondent Duterte, who occupies the second highest office of the land and with access to an extensive complement of security forces (and an admitted access to contract

¹⁴ Duterte rants against Marcos, govt, calls on military to protect Constitution (Part 4/4). YouTube. <https://www.youtube.com/watch?v=QSNcKRNfVaM>.

¹⁵ Section 1. Public office is a public trust. Public officers and employees must, at all times, be accountable to the people, serve them with utmost responsibility, integrity, loyalty, and efficiency; act with patriotism and justice, and lead modest lives.

¹⁶ Section 1. The executive power shall be vested in the President of the Philippines.

¹⁷ Section 18. The President shall be the Commander-in-Chief of all armed forces of the Philippines x x x.

¹⁸ Rev. Penal Code, arts. 139, 141-142.

¹⁹ Rep. Act No. 11479 (2020), §§4-9. The Anti-Terrorism Act of 2020 [hereinafter “ATLA”].

killers), indicates an intent to endanger the life of, or cause the death of, the President, the First Lady, and the Speaker of the House of Representatives to, among others, create a public emergency and foster an atmosphere of fear.

20. These same words emanating from the occupant of the second highest office of the land is also tantamount to a Betrayal of Public Trust. The rhetoric sends a clear message: no one is beyond the killing reach of the Vice-President, respondent Duterte. At the risk of belaboring the obvious, one who openly dares to destabilize the Government by threatening to remove members of its leadership by a violent act — leaders whom the People chose and elected to lead — is undeserving of holding public office.

ARTICLE II: Respondent Betrayed The Public Trust And/Or Committed Graft And Corruption In Her Misuse and Malversation Of Confidential Funds Appropriated To The OVP And The DepEd.

21. Respondent Duterte has gravely betrayed the public trust and revealed herself to be **unfit** to discharge the trust reposed upon her office in handling public funds. This has been shown not only by her **misuse** and/or **malversation** of Confidential Funds, but also by her repeated attempts to conceal and suppress relevant information and documents on her fraudulent liquidations of how the Confidential Funds were spent.

22. In these two (2) years as Vice-President of the Republic, respondent Duterte has managed to gain direct control of at least Six Hundred Twelve Million Five Hundred Thousand Pesos (PhP612,500,000.00) of Confidential Funds, all of which were wantonly and questionably spent in exorbitant, if not fictitious, expenses.

23. Among others, the inquiry conducted by the House of Representatives on the utilization of Confidential Funds by her offices clearly show that the supposed “confidential expenses” where these funds are supposed to have been spent on are nothing more than **ghost expenses**.

24. In fact, the OVP and DepEd Special Disbursing Officers (“SDOs”), Gina F. Acosta and Edward Fajarda (“Fajarda”), have both declared under oath that they supposedly have no knowledge

on where the Confidential Funds were spent, as they were instructed directly by respondent Duterte to merely turn over the Confidential Funds to another individual immediately after the said funds were taken out from the bank, in cash.

25. In other words, public funds in the total amount of Six Hundred Twelve Million Five Hundred Thousand Pesos (PhP612,500,000.00) Million merely vanished into thin air.

**A. On The Matter Of The 2022 and 2023
Confidential Funds Of The Office Of The OVP**

**1. If The Liquidation Reports And
Supporting Documents Are
Given Any Credence, Then The
Confidential Funds of the OVP
Under Respondent Duterte Were
Applied To Unjustifiably
Exorbitant, Excessive,
Extravagant And/Or
Unconscionable Expenditures**

26. As shown by the OVP's own Liquidation Report, the 2022 OVP Confidential Funds in the total amount of One Hundred Twenty Five Million Pesos (PhP125,000,000.00) were certified by respondent Duterte herself to have been fully disbursed and liquidated (*i.e.* spent) during the period of December 21, 2022 to December 31, 2022 or within a short period of eleven (11) days. In other words, the OVP, under respondent Duterte, spent the amount of Eleven Million Three Hundred Sixty Three Thousand Six Hundred Thirty Six and 36/100 Pesos (**PhP11,363,636.36**) **per day**. Suspiciously, this period included four (4) non-working holidays, *i.e.*, Christmas Eve, Christmas Day, Rizal Day and New Year's Eve.

27. Pertinently, according to the *2022 OVP CF Accomplishment Report*, these were spent for "Surveillance and Monitoring".

27.1. Among these "Surveillance and Monitoring" expenses was the amount of Sixteen Million Pesos (PhP16,000,000.00) allegedly spent on the rental and maintenance of safehouses. It bears emphasis that this was for a mere eleven (11)-day period. Meaning to say, the OVP, under respondent Duterte, spent the

amount of One Million Four Hundred Fifty Four Thousand Five Hundred Forty Five and 45/100 Pesos (PhP1,454,545.45) per day for the rental and maintenance of safehouses.

27.2. Such amount is clearly exorbitant, unconscionable and excessive. In fact, one of the Documentary Evidence of Payment (“DEP”) submitted by the OVP would show that the amount of One Million Pesos (PhP1,000,000.00) was paid for a single safehouse’s rental and maintenance on December 26, 2022, or five (5) days before the end of the liquidation period. In other words, the rental and maintenance of this safehouse amounted to Two Hundred Thousand Pesos (PhP200,000.00) per day, more expensive than a full week at the most luxurious hotels.

28. For the year 2023, the OVP, under respondent Duterte, utilized the total amount of Three Hundred Seventy Five Million Pesos (PhP375,000,000.00) out of the appropriated amount of Five Hundred Million Pesos (PhP500,000,000.00) in Confidential Funds. The amount of One Hundred Twenty Five Million Pesos (PhP125,000,000.00) was disbursed and utilized for each of the first three quarters of 2023 – Q1 2023, Q2 2023, and Q3 2023.

29. Included in the *Liquidation Reports* for Q1, Q2 and Q3 2023 were expenses for the rental and maintenance of safehouses in the amounts of Sixteen Million Pesos (PhP16,000,000.00) for Q1, Sixteen Million Pesos (PhP16,000,000.00) again for Q2, and all of a sudden, Five Million Pesos (PhP5,000,000.00) for Q3.

30. These amounts, aside from being exorbitant, unconscionable and excessive, are by themselves, suspicious. Relevantly, during Q4 2022, the OVP liquidated the same amount of Sixteen Million Pesos (PhP16,000,000.00) for the rental and maintenance of safehouses for Q1 and Q2 2023, corresponding to liquidation periods that consisted of fifty-one (51) days and sixty-six (66) days each, respectively. Meaning, for the fifty-one (51) days and sixty-six (66) days each corresponding to Q1 and Q2 2023, **the OVP spent the same amount it did for the mere eleven (11) days of safehouse maintenance and expense in Q4 2022.** Then, without explanation, the OVP merely spent the amount of Five Million Pesos (PhP5,000,000.00) in Q3 2023 for a longer period of seventy-nine (79) days. This illustrates that these expenses are either unconscionably exorbitant and excessive, since the OVP can spend Sixteen Million Pesos (PhP16,000,000.00) in eleven (11)

days for an item that it later on spent only a third of, or Five Million Pesos (PhP5,000,000.00), to cover seventy-nine (79) days, or that these expenses are entirely fictitious, and these figures are nothing more than a bogus liquidation.

2. The Confidential Funds of the OVP Under Respondent Duterte Was Malversed, With The Supporting Documents For Their Liquidation Being Clearly Fraudulent And Fabricated

31. Confidential Funds of national government agencies like the OVP and DepEd are public funds held in trust. Thus, under current rules and guidelines, the liquidation of Confidential Funds must be done through, among others, the submission of Liquidation Reports and accompanying Certifications saying that these Liquidation Reports are accompanied by DEPs, which supposedly show how these Confidential Funds were spent.

32. Significantly, it was only after the COA raised the lack of documentary basis for the liquidation of the 2022 and 2023 Confidential Funds that the OVP submitted DEPs, which consisted of bare Acknowledgement Receipts in a standard form indicating the amount involved, the general purpose of the disbursement, and the supposed payee.²⁰

33. The OVP DEPs gave the House Committee on Good Government and Public Accounts (“CGGPA”), the proverbial *smoking gun – but in the plural form, because of its sheer number*. An examination of these OVP DEPs, including those that were highlighted during Congressional Hearings, shows that these have clear and outright badges of fraud, including, among others, the following observed issues or discrepancies and/or forgeries:²¹

- (a) Hundreds of DEPs where the names of the payee are either unreadable, have incomplete names, are unsigned, have no names at all, or are undated;

²⁰ See: Sample standard Acknowledgment Receipt

²¹ See: Sample Documents Evidencing Payment (DEPs) or Acknowledgment Receipts where the names of the payee are either unreadable, have incomplete names, are unsigned, have no names at all, or are, undated, attached as **Annex “R-series”**. Note, out of precaution, some names have been redacted in accordance with Rep. Act No. 10173 or the “Data Privacy Act of 2012.” This does not mean, however, that the information redacted is confirmed to be true and accurate.

- (b) Repeating names, indicating payees who supposedly received confidential funds several times;
- (c) Payees who appear in **both** the DEPs submitted by the DepEd and those submitted by the OVP for its use of confidential funds;
- (d) DEPs supposedly executed by different persons, but show that they were written with the same distinct ink and pen and appear to be written with the same handwriting, despite having been executed in different and far locations;
- (e) DEPs with clearly made-up or fictitious names such as “Mary Grace Piattos”;
- (f) DEPs showing physical impossibility of actual disbursement, as evidenced by DEPs executed on 23 December 2022 – supposedly evidencing one hundred eleven (111) disbursements in a single day ; and
- (g) DEPs bearing dates which, absurdly, fall within periods when the OVP had **no** Confidential Funds to be disbursed.

That these DEPs were submitted to the COA is damning because respondent Duterte **signed the Certifications,²² which are under oath, and the Accomplishment Reports on Utilization of Confidential and Intelligence Funds, and therefore,²³ certified as to the correctness of the expenses (and supporting documents) in the utilization of the Confidential Funds.**

34. Furthermore, out of the 1,992 names of recipients of Confidential Funds from the OVP which were submitted to the Philippine Statistics Authority (“PSA”) for verification, at least 1,322 names were found to be without birth records,²⁴ and are

²² The *OVP Certifications* dated 10 January 202[3], 30 March 2023, 11 July 2023, and 9 October 2023 are attached as **Annexes “B” to “E”**.

²³ The *OVP Undated Accomplishment Report for the period covering 21 to 31 December 2022*, the *OVP Accomplishment Reports* dated 30 March 2023, 11 July 2023, and 9 October 2023 are attached as **Annexes “F” to “I”**.

²⁴ The *PSA Certification* dated 11 December 2024 from the PSA [redacted to conceal names with confirmed matches in civil registry] is attached as **Annex “J”**. *1,322 OVP Confidential Fund Recipients Lack Birth Records – PSA*, INQUIRER.NET. 30 December 2024, <https://newsinfo.inquirer.net/2015753/1322-ovp-confidential-fund-recipients-lack-birth-records-psa>. The *PSA Certification* dated 25 November 2024 from the PSA [re: Mary Grace Piattos] is attached as **Annex “J-1”**.

thus fictitious names. Based on a thorough review of the DEPs, the total amount indicated to have been disbursed from the OVP Confidential Funds to such fictitious persons was at least **Two Hundred Fifty-Four Million Eight Hundred Ninety-Eight Thousand pesos (PhP254,898,000.00)**.

35. Further, and even assuming that the DEPs were not fraudulent or fabricated, **they still evidence the fact that Confidential Funds were appropriated for non-confidential activities and expenses, and therefore, MALVERSED.** This is buttressed by the fact that more than half of the 4Q 2022 OVP Confidential Funds, or the amount of Seventy Three Million Two Hundred Eighty Seven Thousand Pesos (PhP73,287,000.00),²⁵ was disallowed by the COA upon a determination that the sums disallowed had absolutely nothing to do with the purposes for which they were intended to be used, *i.e.*, expenditures related to peace and order and/or national security. Such disallowance is significant, and gives rise to a presumption of malversation²⁶ as well as demonstrates an undeniable misuse of public funds and dereliction of duty that is tantamount to a Betrayal of Public Trust.²⁷

36. On this point, illegal use of public funds broadly means to improperly use these funds, including misappropriating or dedicating it for some purpose other than that for which it was intended.²⁸ Dereliction of duty, on the other hand, pertains to gross negligence in the performance of one's duty, *i.e.*, a flagrant and culpable refusal or unwillingness to perform one's duty.²⁹ These two (2) principles, when taken in the context of public funds, give rise to a Betrayal of Public Trust considering that funds intended by the People, through their Representatives, to be dedicated to a specific purpose is disregarded and, worse, disregarded for a purpose not properly made clear to the People. This is the height of unfaithfulness to the trust reposed by the People to a public official (more so to those occupying the highest echelons of power in the Government).

²⁵ COA Notice of Disallowance No. 2024-002-100 dated 8 August 2024 issued to OVP, a copy of which is attached herein as **Annex "T"**. See also OVP Letter dated 21 August 2024 to the Commission on Audit and COA Letter dated 21 August 2024 to the Committee on Appropriations, House of Representatives, which are attached as **Annexes "T-1"** to **"T-2"**, respectively

²⁶ Article 217 of the Revised Penal Code ("RPC") states that "failure of a public officer to have duly forthcoming any public funds or property with which he is chargeable, upon demand by any duly authorized officer shall be *prima facie* evidence that he has put such missing funds or property to personal use."

²⁷ **Gonzales III vs. Office of the President of the Phils.**, 694 Phil 52 (2012).

²⁸ Article 220 of the RPC. **Parungao vs. Sandiganbayan**, 197 SCRA 173 (1991).

²⁹ **Trinidad vs. Office of the Ombudsman**, G.R. No. 227440, 2 December 2020.

B.
**On The Matter Of The Confidential Funds Of The
DepEd**

***Confidential Funds For The
DepEd For 2023***

37. In 2023, DepEd, the agency charged with the governance of formal and non-formal basic education,³⁰ which was then under the leadership of respondent Duterte, utilized the total amount of One Hundred Twelve Million Five Hundred Thousand Pesos (PhP112,500,000.00), or seventy-five percent (75%) of the One Hundred Fifty Million (PhP150,000,000.00) (“CF2-DepEd”) in Confidential Funds appropriated to DepEd for Fiscal Year 2023, which were appropriated upon the unprecedented request of respondent Duterte for such Confidential Funds.

38. Considering that it was the first time that the DepEd was entrusted with Confidential Funds, respondent Duterte, in her then capacity as Secretary of Education, **was expected to exercise the highest degree of accountability and transparency in the use of the CF2-DepEd.** This was not the case.

38.1. On the contrary, testimony was received by the House of Representatives’ CGGPA to the effect that respondent Duterte had kept the entire DepEd in the dark on the utilization of these funds. In fact, DepEd’s Chief Accountant, Ms. Ma. Rhunna Catalan, (“Catalan”), who is a required signatory to the Liquidation Reports, declared under oath that she was only “made to sign” the Liquidation Reports and was only shown the cover letter of the submission made to the COA evidencing the use of confidential funds and was not shown the supporting documents for its utilization.

38.2. Various evidence have also been submitted before the House of Representatives’ CGGPA that tend to prove that the COA was deceived in an apparent attempt to hide the truth regarding the expenditure of the CF2-DepEd. In particular, the Acknowledgement Receipts which respondent Duterte caused to be submitted to the COA to prove that the CF2-DepEd were used for the CF-DepEd Programs were, at best

³⁰ Rep. Act No. 9155 (2001). Governance of Basic Education Act of 2001.

highly questionable, and, at worst, obviously fabricated.

39. The recent inquiry of the CGGPA and the proceedings for the deliberations of the National Budget for Fiscal Year 2025 relating to the DepEd revealed an unmistakable truth: the CF2-DepEd appears to have not been used by respondent Duterte for the CF-DepEd Programs.

40. A number of examples demonstrate the misuse, misappropriation, and/or malversation of the CF2-DepEd. For instance, to justify the liquidation of the amount of Fifteen Million Five Hundred Forty Thousand Pesos (PhP15,540,000.00) worth of CF2-DepEd for payment of rewards,³¹ DepEd submitted to the COA four (4) different *Certifications* of various dates (collectively, the “*YLS Certifications*”) signed by Col. Manaros M. Boransing, Lt. Col. Carlos B. Sangdaan, Jr., Col. Magtangol G. Panopio, and Maj. Gen. Adonis R. Bajao (collectively, the “*YLS Commanders*”).³² Purportedly, these *YLS Certifications* would show that the various Youth Leadership Summits (“*YLS*”) and Information Education Campaigns (“*IECs*”) hosted by the military were made possible by a portion of the CF2-DepEd. However, a number of circumstances militate against this claim.

40.1. For one, the *YLS Commanders* all stated on record before the CGGPA that the various *YLS* and *IECs* undertaken by their military units were on account of the Philippine Army and/or the Local Government Units where these *YLS* and *IECs* were held, and their units did not receive any amount from the DepEd.

40.2. For another, the *YLS* and *IECs* appear to be projects that fall under the Counter-Insurgency Program of the DepEd for Fiscal Years 2022 and 2023. However, the amount of CF2-DepEd used as rewards for informants only amounted to Four Million Fifty Thousand Pesos (PhP4,050,000.00), which is significantly less than the Fifteen Million Five Hundred Forty Thousand Pesos (PhP15,540,000.00) supposedly spent by the DepEd.

³¹ See *Audit Observation Memorandum No. 2024-015* dated 1 February 2024, a copy of which is attached herein as **Annex “S”**.

³² See *Reply to AOM* dated 17 April 2024, a copy of which is attached herein as **Annex “S-1”**. Copies of the *Certifications* of various dates signed by Col. Manaros M. Boransing II, Lt. Carlos B. Sangdaan, Jr., Lt. Magtangol G. Panopio, and Maj. Gen. Adonis R. Bajao are attached as **Annex “S-2”**.

41. It would likewise appear that the DEPs submitted to justify the liquidation the CF2-DepEd were fabricated – another set of *smoking guns*. An examination of DepEd DEPs demonstrated similar badges of fraud and irregularity as those observed in the OVP DEPs, including, among others, the following issues or discrepancies and/or are forgeries:

- (a) Hundreds of DEPs with missing names of supposed payees, either because the writing is unreadable, there are incomplete names, or the DEPs bore only the supposed payee's signature;
- (b) Physical impossibility of actual disbursement, as evidenced by DEPs executed on the same day but involving transactions across distant cities or provinces. For example, the disbursement made by the DepEd on March 15, 2023, totaling One Million Three Hundred Seventy Thousand Pesos (PhP1,370,000.00), was supposedly disbursed to twenty-six (26) payees, in various locations all over the Philippines, including Laguna, Zamboanga Del Sur, Ifugao, Samar, Cavite, and Pasay.
- (c) Repeating names;
- (d) DEPs supposedly executed by different persons but bearing the same style of handwriting or same type of ink or pen; and
- (e) DEPs where the same signature appeared above different names.

42. Again, and like in the OVP, these DEPs were submitted to the COA. This is fatal because respondent Duterte signed Certifications,³³ which are under oath, and the Accomplishment Reports on the Utilization of Confidential and Intelligence Funds³⁴ and therefore, certified as to the correctness of the expenses (and supporting documents) in the utilization of the Confidential Funds.

43. A compilation of illustrative examples³⁵ show that the

³³ The *DepEd Certifications* dated 31 March 2023, 30 June 2023, and 2 October 2023 are attached as **Annexes "K" to "M"**.

³⁴ The *DepEd Accomplishment Reports* dated 31 March 2023, 30 June 2023, and 30 September 2023 are attached as **Annexes "N" to "P"**.

³⁵ See: Random sampling of these DEPs and the indicators of the badges of fraud for both the OVP and the DepEd, attached as **Annex "R-series"**. Note, out of precaution, some names have been redacted in accordance with Rep. Act No. 10173 or the "Data Privacy Act of 2012." This does not mean, however, that the information redacted is confirmed to be true and accurate.

CF2-DepEd did not go to the intended projects and programs, and to the persons to whom they were supposedly paid to. This is classic, *prima facie* malversation. It, thus, begs the question: where did the money actually go?

44. Furthermore, out of the 677 names of recipients of Confidential Funds from DepEd which were likewise submitted to the PSA for verification, 405 names were found to be without birth records. The DEPs bearing these fictitious names correspond to a total disbursement amounting to at least Forty-Three Million Two Hundred Forty-Nine Thousand Eight Hundred pesos (PhP43,249,800).³⁶

45. Given the foregoing, there arises a strong presumption that the Confidential Funds of the DepEd and OVP were misappropriated for personal gain or use, by virtue of Article 217 of the Revised Penal Code. This amounts to malversation of public funds and graft and corruption under Republic Act No. 3019 or the Anti-Graft and Corrupt Practices Act (“the Anti-Graft and Corrupt Practices Act”), and by its sheer amount, even **Plunder**.

46. As held in ***De Guzman v. People***, G.R. No. L-54288, 15 December 1982, “[i]n Malversation, all that is necessary to prove is that the defendant received in his possession public funds, that he could not account for them and did not have them in his possession and that he could not give a reasonable excuse for the disappearance of the same.”

47. At this juncture, it bears reiterating that no less than the 1987 Constitution itself instituted “betrayal of public trust” as a ground to impeach the Vice-President, among other key officials of the government. According to the deliberations of the 1986 Constitutional Commission, “betrayal of public trust” refers to “[a]cts which are just short of being criminal but constitute gross faithlessness against public trust, tyrannical abuse of power, inexcusable negligence of duty, favoritism, and gross exercise of discretionary powers.”³⁷

³⁶ The *PSA Certification* dated 8 December 2024 from the PSA [redacted to conceal names with confirmed matches in the civil registry] is attached as **Annex “Q”**. See *No Record of 60,677 Alleged DepEd Confidential Fund Recipients – PSA*, PHILIPPINE STAR, 9 December 2024, <https://www.philstar.com/headlines/2024/12/09/2406157/no-record-60-677-alleged-deped-confidential-fund-recipients-psa>.

³⁷ Records of the 1986 Constitutional Commission, Vol. II, p. 286.

C. On Respondent Duterte's Acts of Resisting Accountability and Suppressing Information On The Utilization of Confidential Funds

48. Respondent Duterte actively resisted any inquiry into the Confidential Funds of the OVP and DepEd. This is suppression, plain and simple. It goes against Section 1, Article XI,³⁸ Section 28, Article II,³⁹ and Section 7, Article III⁴⁰ of the 1987 Constitution.

49. Notably, through her Chief-of-Staff, Undersecretary Atty. Lopez, respondent Duterte deliberately attempted to keep the COA from complying with a Congressional subpoena requiring the production of documents which would shed some light into her use of the OVP and DepEd Confidential Funds.⁴¹ Likewise, respondent Duterte, and staff members of the OVP including Atty. Lopez and the former SDO of DepEd, Mr. Fajarda, repeatedly refused to participate in congressional legislative inquiries regarding the utilization of the OVP Confidential Funds and only faced the inquiry when they were issued subpoenas.

50. These attempts to suppress relevant documents and withhold information on the utilization of the Confidential Funds of the OVP and DepEd were clearly undertaken for one purpose – to conceal the malversation of public funds.

51. If respondent Duterte has nothing to conceal and the funds were all disbursed and liquidated properly, she should have no difficulty in providing a **transparent** and **comprehensive** accounting of the utilization of these Confidential Funds.

52. The fact that respondent Duterte deliberately failed and repeatedly refused to account for the expenditure of Confidential Funds of the OVP and DepEd, and engaged in maneuvers purposely designed to prevent scrutiny is, beyond a shadow of a

³⁸ Section 1. Public office is a public trust. Public officers and employees must, at all times, be accountable to the people, serve them with utmost responsibility, integrity, loyalty, and efficiency; act with patriotism and justice, and lead modest lives.

³⁹ Section 28. Subject to reasonable conditions prescribed by law, the State adopts and implements a policy of full public disclosure of all its transactions involving public interest.

⁴⁰ Section 7. The right of the people to information on matters of public concern shall be recognized. Access to official records, and to documents and papers pertaining to official acts, transactions, or decisions, as well as to government research data used as basis for policy development, shall be afforded the citizen, subject to such limitations as may be provided by law.

⁴¹ *OVP Letter* dated 21 August 2024 to the Commission on Audit attached as **Annex "T-1"**.

doubt, a Betrayal of Public Trust, or those “[a]cts which are just short of being criminal but constitute gross faithlessness against public trust, tyrannical abuse of power, inexcusable negligence of duty, favoritism, and gross exercise of discretionary powers.”⁴²

ARTICLE III: Respondent Betrayed The Public Trust And/Or Committed Bribery And/Or Other Acts Of Graft And Corruption In Violation Of Republic Act No. 3019.

53. Respondent Duterte has further demonstrated her unfitness to hold public office, by her commission of acts of bribery and graft and corruption.

54. Graft and Corruption, as a ground for impeachment under Article XI, Section 2 of the Constitution refers to the corrupt practices enumerated under Section 3 of Republic Act No. 3019. Among the corrupt practices constituting graft and corruption are the acts of:

“persuading, inducing or influencing another public officer to perform an act constituting a violation of rules and regulations duly promulgated by competent authority, or an offense in connection with the official duties of the latter, or allowing himself to be persuaded, induced, or influenced to commit such violation or offense;”⁴³ and

“causing any undue injury to any party, including the Government, or giving any private party any unwarranted benefits, advantage or preference in the discharge of his official administrative or judicial functions through manifest partiality, evident bad faith or gross inexcusable negligence.”⁴⁴

55. Corrupt acts have been uncovered to have been committed by respondent Duterte during the conduct of the hearings before the CCGPA. This includes, among others, the act of **distributing monetary gifts to DepEd officials holding**

⁴² *Gonzales III vs. Office of the President of the Phils.*, 694 Phil 52 (2012).

⁴³ Section 3(a) of Republic Act No. 3019.

⁴⁴ Section 3(e) of Republic Act No. 3019.

procurement-related functions, as revealed by the testimonies of:

- (a) former DepEd Undersecretary and designated Head of Procuring Entity Gloria Jumamil-Mercado;
- (b) DepEd Director Resty Osias – who was formerly a member of the Bids and Awards Committee VI of the DepEd; and
- (c) DepEd Chief Accountant Catalan.

56. Monetary gifts were also caused to be widely distributed by respondent Duterte to various field personnel using funds from supposedly unknown sources, a fact admitted also by the DepEd SDO, Mr. Fajarda, who was tasked by respondent Duterte to distribute said monetary gifts.

57. Further, it was likewise revealed in the hearings before the CCGPA that Atty. Reynold Munsayac, a close associate of respondent Duterte who was her law school batchmate and former OVP spokesperson before being subsequently appointed by respondent Duterte as Assistant Secretary for Procurement in DepEd, sought to rig the bidding of the DepEd Computerization Program.

58. In committing, tolerating and sanctioning such acts of bribery and graft and corruption, respondent Duterte gravely breached the public trust by knowingly, willfully, and deliberately violating RA 3019 and RA 6713 on the Code of Conduct and Ethical Standards for Public Officials and Employees.

59. In facilitating violations of RA 9184 or the Government Procurement Reform Act through the rigged procurement of laptops under the DepEd Computerization Program, respondent Duterte violated the confidence reposed by the public upon her as the second-highest elected official of the land. In doing so, respondent Duterte violated her **duty to safeguard public funds** and effectively paved the way for the raid of government coffers.

60. By this conduct, respondent Duterte has acted in a manner grossly incompatible with her duties as Vice-President, the Constitution, and law. Thus, she should be impeached.

ARTICLE IV: Respondent Committed Culpable Violations Of The Constitution And/Or Betrayal Of Public Trust In Amassing Unexplained Wealth And Failing To Disclose All Her Properties And Interests In Properties In Her SALN, In Violation Of Section 17, Article XI Of The 1987 Philippine Constitution

61. Respondent Duterte has been in public office since 2007, with only a three (3)-year hiatus between 2013-2016. However, an examination of the properties and assets accumulated by respondent Duterte and the SALNs she filed during her years in public office show **TWO (2) THINGS: One**, that the growth in her net worth, assets and properties is grossly disproportionate to her legitimate income, and **Two**, vast amounts of hidden and unexplained wealth discovered through a series of investigations were not disclosed in these SALNs.

62. Prior to her assumption in office as Vice-President, respondent Duterte served as the Vice-Mayor of Davao City from 30 June 2007 to 30 June 2010, and subsequently as the Mayor of Davao City from 30 June 2010 to 30 June 2013, and later from 30 June 2016 to 30 June 2022.

63. While the corresponding salaries for these public offices amount only to an estimated annual income of Two Million Forty Thousand Pesos (PhP2,040,000.00) to Two Million Six Hundred Forty Thousand Pesos (PhP2,640,000.00), respondent Duterte's **bank accounts** throughout the said years reflect deposits and financial transactions cumulatively involving amounts that are grossly disproportionate to her legitimate income as Vice Mayor and Mayor of Davao City.⁴⁵

64. Among others, it has been discovered that the amount of more than **TWO BILLION PESOS** was transacted from 2006 to 2015 across several joint accounts maintained by respondent Duterte and her father, former President Rodrigo R. Duterte, with the Bank of the Philippine Islands and Banco De Oro Unibank. Respondent Duterte herself received at least One Hundred Eleven Million Six Hundred Thirty Four Thousand One Hundred Fifty Four and 05/100 Pesos (PhP111,634,144.05) during the same period of 2006 to 2015, when she was a sitting public official of Davao City, either as Vice-Mayor or as Mayor of the said city.

⁴⁵ Trillanes accuses Duterte children of having P300M in bank accounts, 4 April 2016. GMA Network <https://www.gmanetwork.com/news/topstories/nation/565043/trillanes-accuses-duterte-children-of-having-p300m-in-bank-accounts/story/>.

65. This hidden wealth in the amount of more than **TWO BILLION PESOS** far eclipses the estimated One Hundred Eighty Three Million Pesos (PhP183,000,000.00) discovered in the peso and dollar deposits of the impeached Chief Justice, Renato C. Corona, and cannot in any way come from legitimate sources. Evidently, it is impossible to amass the amounts remitted to respondent Duterte's account based on her legitimate income as a public official. As a career government official (in the absence of any other sources of income), it is impossible to legitimately amass this level of wealth, given that in 2007, her declared Net Worth was only Thirteen Million Eight Hundred Seventy Seven Thousand Four Hundred Sixty Nine Pesos (PhP13,877,469.00) or a far cry from the billions of pesos in her bank accounts.

66. On this point, Section 2 of Republic Act No. 1379 ("R.A. 1379") raises a *prima facie* presumption that property is unlawfully acquired whenever such amount or property is **manifestly out of proportion to his salary as a public officer**, or employee, and to his other lawful income and the income from legitimately acquired property.

67. Likewise, the acquisition of unexplained wealth is treated as a dismissible offense under Section 8 of Republic Act No. 3019, which punishes any public officer found to have acquired during his incumbency, whether in his name, or in the name of other persons, an amount of property and/or money manifestly out of proportion to his salary and to his other lawful income, with the penalty of dismissal or removal from office.

68. In fact, cases of unexplained wealth have been treated as analogous or similar to bribery or dereliction of duty insofar as the application of Republic Act No. 1405 ("R.A. 1405"), or the law on bank secrecy, is concerned.⁴⁶ Effectively, cases of unexplained wealth, including petitions for forfeiture of illegally amassed properties, are now considered an exception to the rule under R.A. 1405 making bank deposits confidential, and disclosure of bank accounts or deposits where allegedly illegally acquired money is deposited is now allowed.⁴⁷

⁴⁶ *Philippine National Bank vs. Gancayco*, 122 Phil. 503 (1965), where the Supreme Court ruled that the secrecy of bank deposits under Republic Act No. 1405 does not apply in cases where unexplained wealth is involved, unexplained wealth being analogous to cases of bribery or dereliction of duty.

⁴⁷ *Philippine National Bank vs. Gancayco*, 122 Phil. 503 (1965).

**Respondent Duterte's
Anomalous SALNs**

69. Furthermore, it has been discovered that properties and cash were omitted from respondent Duterte's SALNs, in violation of Section 17, Article XI of the 1987 Constitution.⁴⁸

70. The following are reported in respondent Duterte's SALNs from 2007 to 2017:

Year	Real Assets (in PhP)	Personal Assets (in PhP)	Liabilities (in PhP)	Net Worth (in PhP)
2007	10,402,669	5,474,800	2,000,000	13,877,469
2008	11,912,669	8,355,948	1,775,000	18,493,617
2009	10,802,669	9,368,596	1,890,000	18,281,265
2010	10,802,669	10,748,218	5,308,000	16,242,887
2011	10,802,669	11,017,722	7,549,242	14,271,148
2012	18,591,709	12,217,128	8,682,735	22,116,102
2016	30,548,891	11,301,560	6,954,454	34,895,997
2017	30,548,891	20,593,056	6,313,188	44,828,759

71. Evidently, her total net worth as indicated in these SALNs is already manifestly disproportionate to the income she was earning as an elected official. In her time as vice-mayor or mayor of Davao City, her estimated annual income ranged only between approximately Two Million Forty Thousand Pesos (PhP2,040,000.00) to Two Million Six Hundred Forty Thousand Pesos (PhP2,640,000.00).

72. Yet the net worth in her SALNs for the same period cannot be justified by her legitimate income. There are unexplained increases which by, and of themselves, call into question the legitimacy of the assets she has acquired and disclosed in her SALN. In fact, her net worth nearly quadrupled from 2007 to 2017.

73. This patent omission to disclose properties and cash puts into question how she was able to acquire such properties, and the omission is an admission of an intent to hide her act of amassing gross amounts of wealth.

⁴⁸ Section 17. A public officer or employee shall, upon assumption of office and as often thereafter as may be required by law, submit a declaration under oath of his assets, liabilities, and net worth. In the case of the President, the Vice-President, the Members of the Cabinet, the Congress, the Supreme Court, the Constitutional Commissions and other constitutional offices, and officers of the armed forces with general or flag rank, the declaration shall be disclosed to the public in the manner provided by law.

74. Said acts, notwithstanding the fact that they occurred prior to her term as Vice-President of the Republic of the Philippines, undeniably constitute grounds for impeachment. These reveal a clear and troubling pattern of conduct, exhibited in a period spanning years of government service, that fundamentally breaches the public's trust and underscores her unfitness to uphold the responsibilities and ethical standards required of the nation's second highest office. Respondent Duterte's election to the Vice-Presidency does not and cannot inoculate or absolve her for these grave transgressions; rather, it **magnifies** the imperative for her to be made accountable.

ARTICLE V: Respondent Committed Other High Crimes, Including The High Crime of Murder And Conspiracy To Commit Murder.

75. A High Crime is one which, among others, "amount to a breach of the public's confidence" resulting in the hindrance of the due execution of the laws, scandal on the public justice, and failure to conduct oneself on the most distinguished principles of good faith, equity, moderation, and mildness.⁴⁹

76. The crime of Murder, as well as conspiracy to commit Murder, especially in the context of mass killings without due process of law, is undeniably a High Crime which amounts to a breach of the public's confidence.

77. In this regard, and apart from issuing death threats and contracting an assassin for the murder of the incumbent President, the First Lady and the incumbent Speaker of the House of Representatives, respondent Duterte was also directly implicated in continuing the Extra Judicial Killings ("EJKs") of the Davao Death Squad ("DDS") by no less than SPO4 Arturo Lascanas ("Lascanas"), a former leader of the DDS who has been admitted as a witness under protection by the International Criminal Court ("ICC"). The ICC is investigating the EJKs which took place in the Philippines from 2011 to 2018, including the years when respondent Duterte was Mayor of Davao City.

78. In a number of video interviews and video recordings made available to the media and to the public, SPO4 Lascañas attested that respondent Duterte, during her term as Mayor of Davao, personally gave the green light for the DDS killing spree, or Operation Tokhang, in Davao City to continue under her watch

⁴⁹ See **Republic vs. Sereno**, G.R. No. 237428, May 11, 2018.

— albeit with a directive to bury the victims in mass graves in the Laud Quarry instead of leaving them in the streets of Davao. Notably, SPO4 Lascanas stated that respondent Duterte does practice shootings, with Michael Yang, in the Laud Quarry.⁵⁰

79. Needless to state, these public statements of a self-confessed DDS assassin and also made under oath cannot be disregarded. These *ante litem motam* statements put into question respondent Duterte's fitness to continue to sit in office.

80. Respondent Duterte, as then Mayor of Davao City, as these publicly available statements would have it, is implicated in murder, or conspiracy to commit murder, when she allowed, facilitated and sanctioned vigilantes to run free in murdering numerous individuals, unhampered by the rule of law she is meant to enforce – a high crime that renders her grossly unfit of continuing to hold any public office, including that of the position of Vice-President.⁵¹

ARTICLE VI: Respondent, By Herself And/Or In Concert With Others, Committed Acts Of Political Destabilization Constituting, At Least, A Betrayal Of Public Trust And/Or Culpable Violations Of The Constitution, And Even The High Crimes Of Sedition And Insurrection.

81. Respondent Duterte betrayed the public trust when she persistently and repeatedly, by herself and/or in concert with others, committed acts aimed at and tending to destabilize the government, challenge the authority of the incumbent President, promote blatant disregard for orderly governance, and incite sedition and utter disrespect for public authority, the institutions, rules, and public officials.

82. Instead of supporting government institutions and the incumbent administration, respondent Duterte – **who stands to immediately benefit as Vice-President from any overthrow, removal, incapacity and/or assassination of the incumbent President** – has **repeatedly** and **maliciously** caused political turmoil and instability by sowing division and discord within the

⁵⁰ Conversations with Arturo Lascanas Part 4: 'Inday wanted to make her own trademark in the death squad, and that was Oplan Tokhang. VeraFiles. 29 January 2024. <https://verafiles.org/articles/conversations-with-arturo-lascanas-part-4-inday-wanted-to-make-her-own-trademark-in-the-death-squad-and-that-was-oplan-tokhang>

⁵¹ **Republic vs. Sereno**, G.R. No. 237428, 11 May 2018.

government and making public declarations that are tantamount to inciting people to sedition and rebellion against the Marcos administration.

83. A simple perusal of her media and public pronouncements and appearances readily produces innumerable instances when she has actively sowed unrest and/or attacked the authority of the current administration and the President, including:

- (a) Refusing to attend the Third State of the Nation Address of President Marcos, Jr. last 22 July 2024, and declaring that she was “appointing [herself] as designated survivor”⁵² in reference to the presidential line of succession and a popular streaming series which involved a mass terrorist attack occurring during a fictional presidential address that led to the death of the President and almost all attendees.
- (b) Taking part on January 28, 2024 in the “Hakbang ng Maisug Prayer Rally” in Davao City, an event specifically aimed at urging the resignation of President Marcos, Jr., which featured openly hostile statements from respondent Duterte’s family, including her father, former President Rodrigo Duterte, who hurled accusations at President Marcos, Jr., and called the military to arms to encourage them toward rebellious action that would unseat President Marcos, Jr. and elevate respondent Duterte as next-in-line to the Presidency, and her brother, Davao City Mayor Sebastian Duterte, cowing the incumbent President by invoking imagery of a violent revolution and executed leaders.⁵³
- (c) Taking part, on March 12, 2024, in a supposed “prayer rally” organized by the supporters of Pastor Apollo Quiboloy from the Kingdom of Jesus Christ (KOJC) at Liwasang Bonifacio, Manila, where malicious statements against the “legitimacy” of President Marcos, Jr. and threats of violence against his person were made.⁵⁴

⁵² Sara Duterte says ‘designated survivor’ remark not a threat, but also not a joke. 17 July 2024. See: <https://www.philstar.com/headlines/2024/07/17/2370856/sara-duterte-says-designated-survivor-remark-not-threat-also-not-joke>

⁵³ Vigil Prayer Rally for Peace and Justice: Hakbang ng Maisug, USA and SDS NY Unite for Human Rights in the Philippines. 25 June 2024. See: <https://smnnewschannel.com/vigil-prayer-rally-for-peace-and-justice-hakbang-ng-maisug-usa-and-sds-ny-unite-for-human-rights-in-the-philippines/>

⁵⁴ VP Duterte makes surprise appearance at 7th day of “Laban Kasama ang Bayan” Prayer Rally, 13 March 2024. See: <https://smnnewschannel.com/vp-duterte-makes-surprise-appearance-at-7th-day-of-laban-kasama-ang-bayan-prayer-rally/>

- (d) Publicly attacking President Marcos, Jr. and coming to the defense of then-fugitive from justice, Pastor Apollo Quiboloy on August 25, 2024, when respondent Duterte publicly apologized to thousands of members of Quiboloy's Kingdom of Jesus Christ ("KOJC") for campaigning and for running alongside President Marcos, Jr. in the 2022 national elections. She also harshly criticized the police operations at the KOJC Compound, accusing the local police of rights violations for the supposed "excessive force" employed and holding President Marcos, Jr. responsible therefor.⁵⁵
- (e) Making public pronouncements, at a press briefing held on October 18, 2024, as to wanting to decapitate President Marcos, Jr., and not recognizing the authority of any official above her:⁵⁶

"Gusto kong tanggalin yung ulo nya ba."

"I imagined myself cutting his head."

"Hindi marunong maging Presidente ang nakaupo."

"Kung presidente nyo sya, okay lang. Ako, hanggang vice-president lang ako, **hanggang number 2 lang itong bansa na ito, wala itong number 1 para sa akin.**"

84. More recently, respondent Duterte escalated her seditious statements by hurling profanities against President Marcos, Jr. and other public officials, as well as threatening bodily harm and assassination against President Marcos, Jr., the First Lady and the Speaker of the House of Representatives, as previously stated.

85. Respondent Duterte and her family have not limited their attacks to President Marcos, Jr. or to calls for his overthrow or resignation so that respondent Duterte may be elevated as President. She herself has also undermined administration policies and openly defied the authority of other branches of government and government agencies. This is shown by the following acts, among others:

- (a) Respondent Duterte has sowed division and doubt as to the Philippines' position in the escalating tensions in the West

⁵⁵ *Sara Duterte celebrates KOJC anniversary with thousands of Quiboloy followers.* 1 September 2024. See: <https://www.rappler.com/philippines/sara-duterte-celebrates-kojc-anniversary-thousands-apollo-quiboloy-followers/>

⁵⁶ *Vice-President Sara Duterte Talks To Media About Relations With Marcos, OVP Issues.* ANC 24/7. <https://www.youtube.com/watch?v=Hg2n1K1qcMg>

Philippine Sea where, despite the rising occurrence of incidents involving Chinese and Filipino elements, both civilian and military, respondent Duterte remained noticeably and consistently silent, refraining from offering any comment or even a message of support to fellow Filipinos. Whenever asked for a statement on issues affecting the sovereignty of the Philippines, respondent Duterte would deflect the matter by stating that it is “not in her job description” to address it.⁵⁷ Worse, at her press conference held on October 18, 2024, respondent Duterte further undermined the administration’s campaign relating to the West Philippine Sea by referring to it as a fiasco. Her sheer evasiveness and silence on the West Philippine Sea issue, an issue that strikes at the core of Philippine sovereignty is diametrically opposed to her being so loquacious as to other issues;

- (b) She undermined police operations by publicly criticizing the police manhunt conducted to capture then-fugitive Pastor Quiboloy;
- (c) She urged the COA not to comply with a subpoena issued by Congress and assisted her subordinates in not attending Congressional probes, in open defiance of the authority and powers of Congress;
- (d) She physically obstructed the enforcement by the House of Representatives’ Office of the Sergeant-At-Arms (“HoR OSAA”) of a Transfer Order issued by Congress directing the transfer of Atty. Lopez to the Mandaluyong Correctional Institution for Women when Atty. Lopez was detained for contempt of congressional proceedings;
- (e) She refused to adhere to the protocols and rules of the House of Representatives when she insisted on “camping” for two (2) nights in her brother’s office, with utter disregard to the security concerns repeatedly brought to her attention by the HoR OSAA; and
- (f) She made public pronouncements of bribery and corruption in the Supreme Court which served to erode confidence in the judiciary and the judicial system.

⁵⁷ *Paolo Duterte defends Sara’s silence on China aggression at WPS*. 27 March 2024. Philippine Star. See: <https://www.philstar.com/headlines/2024/03/27/2343738/paolo-duterte-defends-saras-silence-china-aggression-wps>

86. By pursuing the above conduct and by her flagrant disregard of the sovereign authority vested by the electorate upon the sitting administration, respondent Duterte is guilty of contravening the 1987 Constitution.⁵⁸

87. These actuations and statements from respondent Duterte do not only cast doubt as to her capability and fitness to continue serving under the same body politic she so criticizes, it also strongly evinces a betrayal of the trust imposed upon her by the public and the dignity required of her office. Her public statements stimulate opposition to national policies, and provoke resentment, disorder, and violence.

Article VII: The Totality Of Respondent's Conduct As Vice-President, Including Her Commission Of The Foregoing Acts, Clearly Display Conduct Constituting A Betrayal Of Public Trust, Culpable Violations of the 1987 Constitution, and Graft and Corruption.

88. Respondent Duterte's conduct throughout her tenure clearly displays gross faithlessness against public trust and a tyrannical abuse of power that, taken together, showcases her gross unfitness to hold public office and her infidelity to the laws and the 1987 Constitution.

89. Thus, in the remote event that any or all of the foregoing, taken individually and in isolation from each other and other acts of respondent Duterte, do not constitute grounds for impeachment, then some or all taken together undoubtedly constitute a culpable violation of the 1987 Constitution, Graft and Corruption, and a Betrayal of Public Trust that renders respondent Duterte unfit to continue in office or to wield the powers and prerogatives of a public office.

90. Finally, this Complaint unmasks **SARA ZIMMERMAN DUTERTE**, Vice-President of the Republic, for what she truly is. She has not only conducted herself in a manner contrary to, and woefully short of the lofty standards to which we hold our public officials, she has also clearly and blatantly committed culpable

⁵⁸ Section 1, Article II of the 1987 Constitution states:

Section 1. The Philippines is a democratic and republican State. Sovereignty resides in the people and all government authority emanates from them.

violations of the constitution, betrayed the public trust, engaged in graft and corruption, and committed other high crimes.

91. It is, therefore, the duty of this Congress to see this impeachment through to the very end, in order to fulfill its ultimate purpose – “**the protection of the people as a body politic.**”⁵⁹ **Must she remain in office as Vice-President? Public officials are held to a certain and exacting conduct and standard, moreso, a sitting Vice-President. These are norms, conduct and standard dictated by law⁶⁰ and jurisprudence.⁶¹ Are we to say that she is exempt?⁶² Who truly is Vice-President Sara Duterte? The Sara Duterte of November 23, 2024 in the live streaming then - in all of its forty-eight (48) minutes - is the real Sara Duterte. *Res ipsa loquitur.***

RESOLUTION /RELIEF

WHEREFORE, premises considered, be it **RESOLVED** as We, the undersigned Members of the House of Representatives constituting at least one-third (1/3) of all the Members thereof, do hereby **RESOLVE** to **FILE** this **COMPLAINT/RESOLUTION** for the **IMPEACHMENT** of the Vice-President of the Republic of the Philippines, the **HON. SARA ZIMMERMAN DUTERTE** on the grounds as discussed and specified above.

RESOLVE FURTHER to have this **COMPLAINT/RESOLUTION** endorsed and transmitted to the SENATE as the **ARTICLES OF IMPEACHMENT** against the Vice-President under and in accordance with **Section 3(4), Article XI of the 1987 Constitution**:

“Section 3. x x x

(4) In case the verified complaint or resolution of impeachment is filed by at least 1/3 of all the Members of the House, the same shall constitute the Articles of Impeachment and trial by the Senate shall forthwith proceed.”

THEREAFTER, it is most respectfully **PRAYED** by the COMPLAINANTS for the SENATE to constitute itself as an

⁵⁹ *Gutierrez vs. Committee on Justice*, 643 SCRA 198, 644 SCRA 804 (2011).

⁶⁰ Republic Act No. 6713 or the Code of Conduct and Ethical Standards for Public Officials and Employees

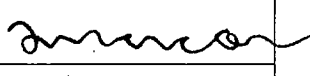
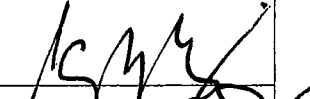


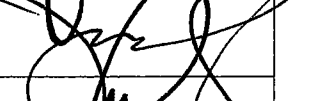
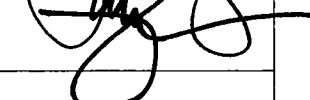
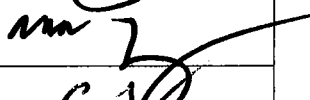

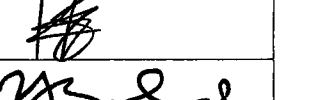




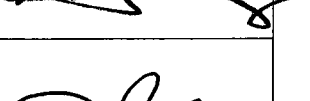


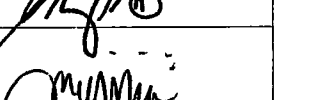
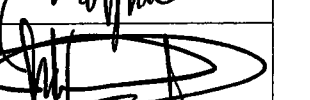
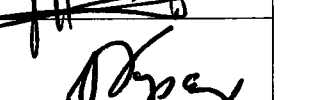
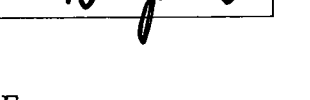
⁶¹ See: *Samson vs. Restrivera*, 646 SCRA 481 (2011), and *Abos vs Borromeo IV*, 764 SCRA 78 (2015); and

⁶² In contrast with a teacher who made a similar online threat against then-President Rodrigo Roa Duterte. See: NBI arrests teacher who posted about reward to kill Duterte. Rappler.com <https://www.rappler.com/philippines/260646-nbi-arrests-teacher-posted-reward-kill-duterte/>

IMPEACHMENT COURT and to forthwith conduct the **IMPEACHMENT TRIAL** against the Vice-President and, after due proceedings, render a **JUDGMENT of CONVICTION** against **VICE-PRESIDENT SARA ZIMMERMAN DUTERTE**, and decree her **REMOVAL** from the Office of the Vice-President and **PERPETUAL DISQUALIFICATION** from holding any public office in the Republic of the Philippines.

OTHER RELIEF AND REMEDIES as may be just and equitable under the premises are also prayed for.

****Signature Pages of Complainants follows.****

No.	Full Name	District / Party-List	Signature
1	Ferdinand A. Marcos	1st Ilocos Norte	
2	AUPELID D. GONZALES JR.	3RD DIST. PAMPANGA	
3	Manuel Jose M. Dalipe	2nd District Zamboanga City	
4	Jesús Jesus M. Romaldo	LD, Cebu	
5	David Catarino Suarez	2nd Quezon	
6	Jefferson F. Khongha	1st District 2nd LD	
7	ANNA VILLARAZA-SUAREZ	ALONA	
8	Francisco Paulo P. Orhag	1st District La Union	
9	Ramon Romeo L. Gutierrez	1-Region Partylist	
10	Yasser Bahndong	2nd dist. LDS	
11	LEX ANTHONY CRIS COLADA	KAMBIS OWA	
12	JOSEPA STEPHAN PARMANO	ABANG LINGKOD	
13	JUDE A ACIDIA	TINGOG	
14	Dan Ferrera Jr	Santa Rosa	
15	Zia Alente Alig	1ST DIST LORAN DEL SUR	
16	Yohann Rommel	TINGOG	
17	AMPARO MARIA ZAVORA	Tagnig	
18	Janette Ganin	1st Dist. Iloilo	
19	MARVIN RILLO	4th Dist. Que	
20	RAUL BOBOY TUPAS	5th D. Iloilo	

COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
21	ERNESTO M. DOMESTICO JR	Maula 1st	
22	IRWIN TELLA	5th	
23	Fidel Nogales	4th Rizal	
24	ROLANDO VASQUEZ	2nd DIST M.L.A.	
25	MANUEL FORTES, JR	2nd DISTRICT SORSOGON	
26	EMERSON D. PASCUAL	4TH DISTRICT LUENA ECUSA	
27	Presly De Jesus	Philippine	
28	ACE S. BARBERS	2D, SIKANGAO DEL NORTE	
29	SERGIO C. DAGOC	APEC PL	
30	Loreto S. Amante	3rd district of Laguna	
31	ROMMEL T. ANGARA	LONG DIST ACROSA	
32	WILTER Y. PALMA	1ST DIST ZAMBUNO. SIBUNGAY	
33	SOLIMON G. CHUNCAWA	L.D. ZAMBUNO	
34	Migz Villafrorte	SD, CANSURE	
35	SANCHO FERNANDO OAMINAL	2D, MISAMIS OCCIDENTAL	
36	Faustino Michael Dy	5th Isabela	
37	MICHAEL M. MORDEN	NI party list	
38	Allen Jesse C. Mangaway	KALINGA	
39	ALFREDO D. MARAÑON	2D NEG. OCC.	
40	PETER MIMENEL	2D Sorsogon Cot.	

COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
41	CARLITO S. MARONZ	1ST DIST - AKIHO	
42	DRUTE S. GARCIA	2nd LA UNION	
43	GERARDO J. ESPINA JR.	LD BILIRAN	
44	LORENZ R. DEFENSOR	3rd ILOILO	
45	GERARDO S. VALMAYOR JR.	1ST. HIGAYON OCC.	
46	Nicanor M. Birones	AGAP PL	
47	Mr. Rene Ann Lourdes G. Nobile	1st District of Cagayan San Pedro	
48	JRENE GAY F. SAULOG	KALINGA PL	
49	RAY FLORENCE T. REYES	ANAKALUSOGAN PL	
50	Emmanuel A. Billores	1ST DIST CAPIZ	
51	CIRIACO B. GATO Jr.	BATANES	
52	DANILLO A. DENIRIHO	1ST Bukara	
53	Neptali Gonzales	Mandaya	
54	FERNANDO T. CABRERO	3rd District, Albay	
55	MUHAMMAD P. FARUK SR	MAGUINDANAO SW	
56	TEODILICO T. HANESA	NR Aklan	
57	JC M. Abalos	4Ps Partylist	
58	MOODY M. ORDONES	Sen. Con. Citizen Priority List	
59	SALVADOR A. PLESAO	LAKAS CMD	
60	Ambrusio Cruz	CONAS CMD	

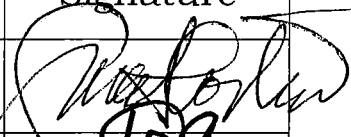

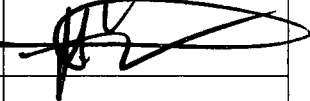

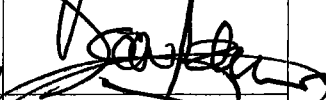


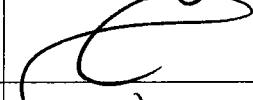
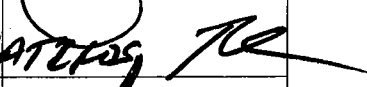






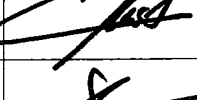

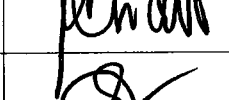
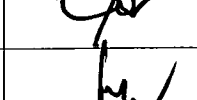
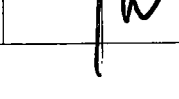
COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
61	Milagros Aquino Maguysay	United Senior Ghizma Party	
62	Gabriel H. Bordado Jr.	3 rd District Cebu Sur	
63	Ma. Victoria Cr. Pilar	Q. City Dist 6	
64	MARY MITZI CAJAYON-UY	3 rd DIST CALOOCAN	
65	HARRIS M. ONGCHUAN	2 nd Dist Northern Samar	
66	PAUL DAZA	1 ST N. SAMAR	
67	ISIDRO LUMAYAG	1 ST DIST SO CAT	
68	ELEONOR R. RODRIGUEZ	LONG DIST	
69	Carmelo B. Logatín II	1 st District of Pampanga	
70	JOSEPH S. TAN	4 th DIST. ISABELA	
71	KRISTINE GINGLIN	2 nd DIST ILOCOS SUR	
72	ED CHRISTOPHER GO	2 ND DIST, ISABELA	
73	JOEL CHUA	3 RD DIST, MANILA	
74	Maen Teodoro	1 st Dist., Marikina	
75	M. MAGSABAD	2 ^d , Neg Cr.	
76	ZALDY S. VILLA	SIBUJON	
77	Ysabel Maria J. Zamorra	San Juan, Zamboanga	
78	Faustino P. Dy V	6 th , Isabela	
79	Franz S. Pumanan	3 rd District of	
80	MURRAY FERRER	4 th DIST Meyers Rd	

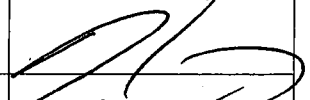
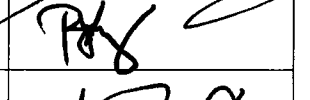
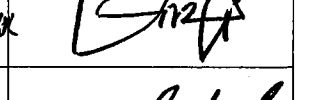
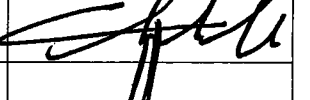


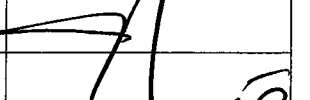

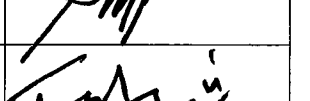
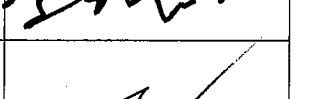
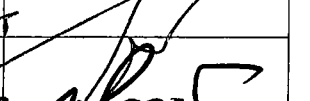
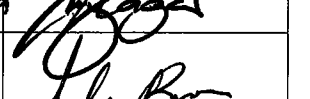
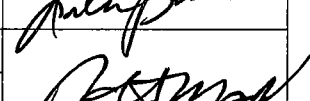
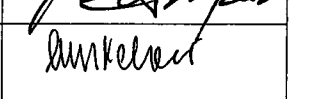

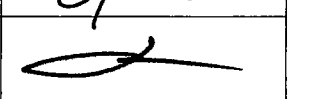
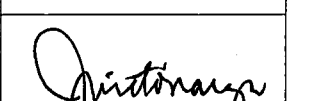
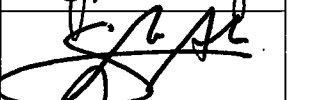

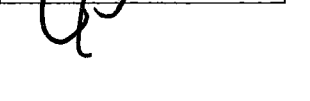
COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
81	LUIS RAYMUND E. VILLAMERTE, JR -	2ND DISTRICT CANSUKE	
82	ROBERTO V. PUNO	1st DISTRICT ANTIPOLO CITY	
83	DORIS E. MANIQUIZ	2nd Dist. Zambales	
84	Marina "Del Mar" Maguina	OPW Party of	
85	GERARDO MORA KONG	10 BATAAN	
86	Crispin Diego D Remulla	7th Cavite	
87	Roy M. Argola	5th - Cebu	
88	ARZONIANO G. CALIXTO	PASAY CITY	
89	POMER S. MONA	SUNGAYO DE SAN 1ST	
90	Gebo G Regencia	Iligan City	
91	LORNA C. SILVERIO	3rd D BULACAN	
92	CHINLE BERNOS	ABRA	
93	BIENVENIDO M. APARTE JR	Gen District Marikina	
94	Eleanor Bulut-Begtanj	1one Dist Apayao	
95	SABY ANNE V. ALFARDO	1st DIST. CAGAYAN VALLEY	
96	JOSEFINA B. TALUNA	1ST DIST. CAM-NORTE	
97	ALBERTINA DOLORES C. PANGLOSS	2nd DISTRICT of Marikina	
98	JOE TEVEZ JR	TALINO, Baling Kili pin	
99	FRANCISCO JOSE F. MATUGAS II	DIST 1, SIARGAO SURIGAO DEL NORTE	
100	JOHN DA LAY	UNION NOW	

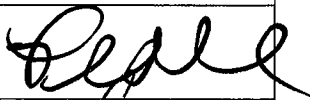

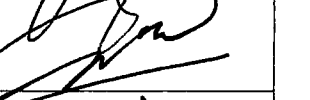
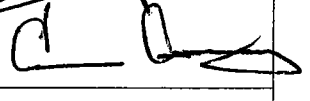



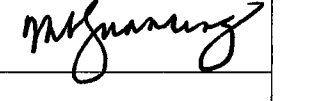
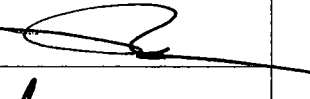

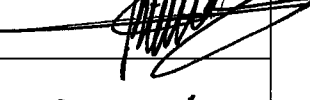
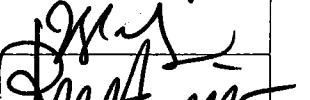

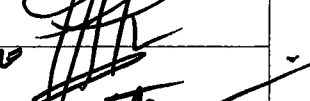
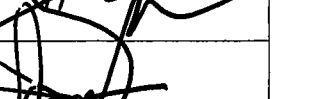


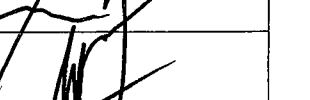
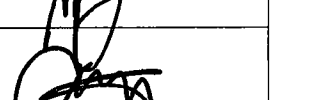
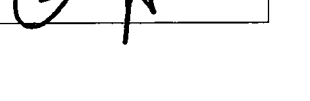
COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
101	JANE T. CASTRO	2D CAPIZ	
102	ALAN ECHE	10th DISTRICT DINAGAT ISL.	
103	AUSTINO FERRELL	60 - CAULTE	
104	MARIA ANHELA S. CARLIN	3D BATAAN	
105	LORETO B. ACHAPAN	Gen Santos City	
106	STEVE SOLON	Sarangani	
107	Keith Tan	4D Quezon Prov.	
108	Reynate Amogara	30 Quezon prov	
109	RICARDO GILZ	TAGUIG PATONG	
110	Ralph Tullio	2nd D QC	
111	DEAN ASISTIO	D3 Calocan	
112	DIMSAIL SANJ	TAWI-TAWI	
113	Ronald Singson	1st Ilocos Sur	
114	Tsuyoshi Anthony Honibata	2nd CamSur	
115	JULIENNE BARONDA	LONE DIST DAVAO CITY	
116	Honrado Gintu	pinunong partylist	
117	JUAN CARLOS ATAYDE	DISTRICT 1 QC	
118	EDGAR M. CHATTO	DIST 1 - BOHOL	
119	MARIA VANESSA CUMENTADO	2ND - BOHOL	
120	Maria Alarcio Tubo	2nd - Bohol	

COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
121	MARK ENVERGA	1D QUEZON	
122	ROBERTO UY JR.	1ST DIST. ZAMB. NORTE	
123	ALFELITO M. BASCUS	1ST DIST. ABOGADO DEL SUR	
124	CHRISTIAN INABIA	1ST DIST. MISAMIS OR.	
125	LORIAN SUAN	COO 1ST	
126	YENGEY BUNTONO	2D MIK. OR	
127	ESSENTO SAERAN	7D Cotabato	
128	ALBERT GARCIA	2nd DIST. BATAAN	
129	PATRICK VARGAS	5th Dist. BC	
130	JOSE S. MQUIÑO	1ST District Agusan Del Norte	
131	France Castro	ACT Teacher	
132	Maria Jamina Katherine B. Aganao	4th District Laguna	
133	ARLENE D. BROSA	Labrador Women's Partylist	
134	RAOUL DANNIEL A. MANUEL	Kabataan Partylist	
135	Anna Victoria Veloso-Tuazon	Third district of Leyte	
136	CHRISTIE ANNE HERNANDEZ	LONG DISTRICT OF ORANGA	
137	Jaime P. Cojuangca	1st District Tula C	
138	Jeyzel Victoria C. Yu	2nd District Zamboanga del Sur	
139	Munir N. Arbison Jr.	2nd District, Sulu	
140	Angelica Natasha C.	Star PL	

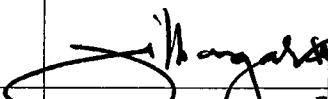
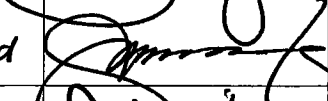

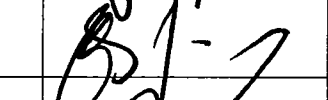

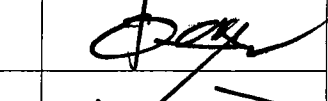


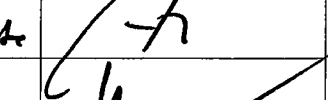

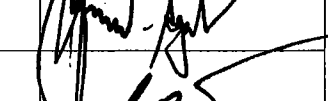
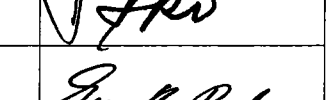
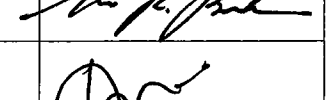
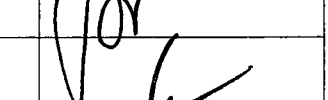
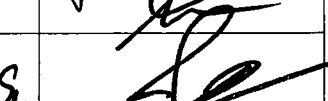

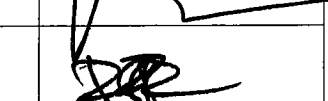
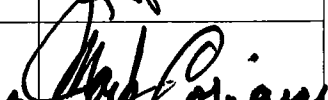

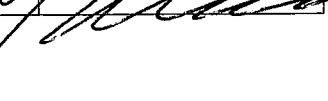
COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
141	PERCIVAL CENOANTA	AKBAYAN	
142	JOHN TRACY CABAR	DAVAO DEL SUR	
143	Joseph Violarzo	2nd Nueva Ecija	
144	EDWIN L. ORIVOREZ	FIRST PAMPANGUE	
145	STELLA A. QUIMPO	SECOND DISTRICT MARIKINA	
146	Gas Trumbantes	2nd Pinaric	
147	Muel G. Aban	5th Negros Occ	
148	MIKAELA B. SUANING	1st District, Nueva Ecija	
149	EDUARDO RAMA	2nd DISTRICT CEBU CITY	
150	PETER JOHN B. CALDERON	7th District Cebu	
151	JOSEPH SY LIMKIEBANG	1st Dist Negros Occ	
152	Janice Salimbangon	4th Cebu	
153	Rhea Gulas	1st district cebu	
154	DAPHNE LAGON	10TH DISTRICT CEBU	
155	DIMPIE MASTURA	MAGUINDANAO DELNORTE WITH COTABATO CITY	
156	ROSEL GALLOS	2nd DISTRICT CEBU PROVINCE	
157	JOHNNY PIMENTEL	2ND DISTRICT SULU DEL SUR	
158	EMMARIE QUANO DIZON	MANDAUE CITY	
159	A. EDWARD PLAZA	2nd DIST DAVAO DEL SUR	
160	CHRISTOPHER YAP	2ND DISTRICT	

COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
161	JASON P. ALMONTÓ	1st Dist Mig Occ	
162	Mario A. Mariño	5th Dist Batangas	
163	Romeo M Acop	2nd District Antipolo City	
164	MAXIMILIO JE. S. DALOG	10, COCA COTACOTAN PROVINCE	
165	KEITH T. FLORES	2ND DIST MARIKINA	
166	MARCELINO E. LIBANAO	4th Partylist	
167	LIMNONI LAMIN RORON	4th Dist Pork	
168	MONIC O. GO	Baguio City	
169	Antonieta E. Eula	2nd Dist Zamboanga	
170	LUZ V. MERCADO	1st D So. Leyte	
171	MARIA FE ABUNGA	E. SAMAR	
172	JOSEPH L. LARA	CAGAYAN 30	
173	MA.THERESA V. COLLANTES	3rd Batangas	
174	ARNAN C. PANALIGAN	1st D, Or. Hingon	
175	FELIMON M. ESPARTE	COOP NATED	
176	Ma. Lucille Nava	Guimaras	
177	GLONA G. LABADLABAN	2ND DIST - ZDN	
178	LEODY "ODIE" TARRIEGA	10. OCC. NDD	
179	GERARDO S. S. F. MADRUGA	Low - Income	
180	DIVINA GRACE C. EU	1st Dist. Zambo. Sur	

COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
181	Raul Angelo Bongalon	AKO BICOL	
182	Gerville R. Luistro	Batangas 2nd	
183	JOSE MANUEL ALBA	DI - BUKIDNON	
184	SHISA CUAPRESTAS	NU12	
185	ALVAN TY	IPGMA	
186	OSCAR MALAYITA	D ¹ CAC.	
187	SIBIE AMILAN @ DIMAPODO	LANAO DEL NORTE 2ND DIST	
188	JERNE JETT V. NISAY	PUSONG PINOY PARTIDOS	
189	Adrian A. Amato	3rd Dist / Zamboanga del Norte	
190	RACILOR MONTIN	2ND DISTRICT, PANGASINAN	
191	MARLYN PRIMICIA ALARIN	3rd - District Pangasinan	
192	LINABELLE VILLARICA	4th District Bulacan	
193	ERIC REYES BUNAIN	1st District BATANGAS	
194	Toff de Venecia	4D - Pangasinan	
195	Ms. Cynthia Chan	Lapu-Lapu	
196	SARIE FUONTERELLA	4th Dist. Cansu	
197	MONTANA RICE	TVCP	
198	R R	LP - Bin	
199	Mark Cojuangco	Dist 2, Pangasinan	
200	BIRON, FORTALEZA	4th DIST - ILOILO	

COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

No.	Full Name	District / Party-List	Signature
201	SAMIER TAN	1ST SULU	Samier Tan
202	ANNA YORK P BONDOC	4th D PAMPANCA	Anna York P Bondoc
203	JAIMIE FRESQUENI	MUNICIPALIDAD	
204	EDWIN L. GARDIOLA	CWC- PL	
205	LOUTA KAREN T. JALIER	2nd DISTRICT LEYTE	
206	Michael B. Gorniceta	2nd District Iloilo	Michael B. Gorniceta
207	JORGE BUSTOS	PSTRDZ	Jorge Bustos
208	Doke Sano	5th District Cebu	
209	Anida Tolentino	8th District Cavite	Anida Tolentino
210	JOCelyn TULFO	ACT- CIS PARTYLIST	Jocelyn Tulfo
211	Greg Gerasimo	Bohol	Greg Gerasimo
212	Ruth Mariano - Hernandez	2nd district Laguna	Ruth Mariano - Hernandez
213	Mr. Anna Samantha Santos	3rd Cotabato	Anna Samantha Santos
214	FLORENDA P. ROSAS	CISAN Bataan	Florenda P. Rosas
215	F. MARTIN C. ROMAN	1st Dist Leyte	F. Martin C. Roman
216			
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COMPLAINT FOR IMPEACHMENT
AGAINST VICE PRESIDENT SARA Z. DUTERTE

SUBSCRIBED AND VERIFIED BEFORE ME on this ___ day of February 2025 at the **HOUSE OF REPRESENTATIVES**, Batasan Pambansa Complex, Constitution Hills, Quezon City by the **COMPLAINANTS**, who are known to me and to me known to be the duly elected Members of the **HOUSE OF REPRESENTATIVES** who signed the foregoing **COMPLAINT OF IMPEACHMENT** against the Vice-President of the Philippines, the **HON. SARA Z. DUTERTE**.

This Instrument, which is in the nature of a **COMPLAINT/ RESOLUTION FOR IMPEACHMENT** consisting of thirty-two (32) pages, excluding the annexes, signature pages, verification, and this page, and has been signed by all of the Complainants on the appropriate signature pages.

WITNESS MY HAND AND SEAL on the date and at the first place first mentioned above.



HON. REGINALD S. VELASCO
Secretary General, House of Representatives