

ARTICLES OF IMPEACHMENT

Prefatory Statement

The Vice President of the Philippines is no ordinary official; she is the second highest official of the Republic; a heartbeat away from the Presidency. To hold such an office is never a license for personal entitlement, but an exacting demand for the highest degree of public accountability.

Regrettably, the evidence reveals a pattern of conduct characterized by a disdain for institutional regularities, contempt of established norms, and a persistent defiance of the checks and balances that govern a democratic state. Vice President Sara Z. Duterte has operated with a manifest sense of impunity, treating the prerogatives of her office not as a shared public trust, but as a personal mandate immune to oversight.

Upon assuming office, she took a solemn oath: *"I do solemnly swear that I will faithfully and conscientiously fulfill my duties as Vice President of the Philippines, preserve and defend its Constitution, execute its laws, do justice to every man, and consecrate myself to the service of the Nation."*

The record, however, demonstrates persistent and systematic conduct that is nothing short of a desecration of that oath. Taken as a whole, the evidence supports the charge that Vice President Duterte committed:

- (a) culpable violation of the Constitution, through the willful and intentional subversion of the supreme law she swore to defend;
- (b) bribery and graft and corruption, by the predatory use of public office for private enrichment and the systematic corruption of the civil service;
- (c) other high crimes, evidenced by the solicitation of assassination and acts that strike at the very security of the State; and
- (d) betrayal of public trust, by deliberate and premeditated acts against the interest of the very people she swore to serve, and the total collapse of the moral and fiduciary fitness required to lead.

In sum, Vice President Duterte has not merely violated the law; she has attempted to dismantle the very foundations of accountability upon which the Republic is built. By her own hand, she has rendered herself an outcast to the Constitution and a threat to the democratic order she was sworn to uphold.

ARTICLE I

RESPONDENT VICE PRESIDENT SARA Z. DUTERTE COMMITTED CULPABLE VIOLATION OF THE CONSTITUTION, GRAFT AND CORRUPTION, AND BETRAYED PUBLIC TRUST THROUGH THE SYSTEMATIC MISUSE, MISAPPROPRIATION, AND IRREGULAR LIQUIDATION OF CONFIDENTIAL FUNDS AMOUNTING TO PHP500,000,000.00 RELEASED TO THE OFFICE OF THE VICE PRESIDENT AND PHP112,500,000.00 RELEASED TO THE DEPARTMENT OF EDUCATION.

On June 19, 2022, respondent took her oath as Vice President of the Republic of the Philippines. On June 30, 2022, she formally assumed office. On the same day, she was likewise appointed Secretary of the Department of Education ("DepEd"). Concurrently holding both positions, respondent exercised authority over two offices with access to confidential funds—public funds governed by strict rules on disbursement, documentation, and accountability.

At the very outset of her tenure, although the conduct of surveillance activities was not part of the mandate of her office, respondent sought access to confidential funds, requesting substantial allocations for the Office of the Vice President ("OVP"). Although only partially granted—and only toward the latter part of 2022—respondent nevertheless proceeded to fully exhaust the amount released within an extraordinarily compressed period.¹

In December 2022, the OVP received Php125,000,000.00 in confidential funds for the fourth quarter. In a span of 11 days—from December 21 to December 31, 2022—respondent caused the entire amount to be disbursed and reported as fully utilized, despite the inclusion of several non-working holidays, rendering ordinary timelines implausible.²

This rapid and total liquidation of a substantial amount of confidential funds—within a timeframe that renders genuine implementation and verification highly improbable—indicates that the disbursements were pre-arranged, simulated, or otherwise irregular.

A particularly striking Commission on Audit ("COA")-flagged transaction during this period involves approximately Php16,000,000.00 reportedly disbursed for "safe house rentals" within an 11-day period in 2022. Based on audit observations, certain rental arrangements reached as high as Php250,000.00 per day—rates comparable to, and even exceeding, that of some luxury resorts and five-star hotel accommodations—raising serious

¹ A copy of the Transcript of Stenographic Notes ("TSN") of the House of Representatives' Committee on Good Government and Public Accountability ("CGGPA") hearing on November 25, 2024 is hereto attached as Annex "A". A copy of the Office of the Vice President ("OVP") Certification dated January 10, 2022 is hereto attached as Annex "B".

² *Id.*

questions on necessity, reasonableness, and purpose relative to confidential fund standards.

This pattern persisted in 2023. Respondent caused the release and utilization of Php375,000,000.00 in confidential funds for the OVP and Php112,500,000.00 in confidential funds for the DepEd, all of which were similarly marked by deficient documentation, questionable purposes, and unverifiable outcomes.³

Instead of complying with COA-DBM-DILG-GCG-DND Joint Circular No. 2015-01, respondent systematically bypassed mandatory safeguards by directing Special Disbursing Officers to transfer custody of confidential funds to unauthorized intermediaries, including military personnel and private individuals who had no legal authority to receive or disburse such funds.⁴

These acts enabled the deliberate movement of large sums of public funds outside the legally prescribed accountability framework, thereby facilitating their diversion for purposes unrelated to lawful confidential operations.

To conceal these acts, respondent caused the preparation and submission of falsified liquidation reports and thereafter certified under oath that the funds were properly utilized, despite the absence of sufficient, credible, and lawful supporting documentation.

One such attempt is a COA-flagged liquidation of DepEd confidential funds in the amount of Php15,540,000.00, supposedly used to finance various Youth Leadership Summits ("YLS") and Information Education Campaigns of the Philippine Army. However, the YLS Commanders who supposedly signed the submitted certifications justifying the expense denied having received any amount from the DepEd.

The foregoing scheme is amply established by documentary records, testimonial evidence, and independent findings of oversight and investigative bodies, including the following:

- (a) Records of hearings before the House of Representatives' Committee on Good Government and Public Accountability ("CGGPA") bear multiple sworn testimonies attesting to irregularities in the handling of confidential funds. Witnesses testified, among others, that Special Disbursing Officers merely released funds upon instruction of respondent to persons outside the proper disbursement channels, without

³ A copy each of the OVP *Certification* dated March 30, 2023, July 11, 2023, and October 9, 2023 and Department of Education ("DepEd") *Certification* dated March 31, 2023, June 30, 2023, and October 2, 2023 are hereto attached as Annexes "C" to "H". See Annex "A," the TSN of the CGGPA hearing on November 25, 2024.

⁴ A copy each of the COA's *Notice of Disallowance* dated March 31, 2026 and *Decision* dated April 10, 2026 are hereto attached as Annexes "I" and "J," respectively.

knowledge of their ultimate use, that officials were made to sign liquidation reports without being shown supporting documents, and that the alleged beneficiaries of certain expenditures categorically denied receiving any funds.⁵

- (b) The COA, through the Intelligence and Confidential Funds Audit Office, verified that respondent's offices received a total of Php500,000,000.00 for the OVP and Php112,500,000.00 for the DepEd, all of which were reported as fully exhausted. This massive expenditure resulted in a *Notice of Disallowance* for Php73,287,000.00 of the OVP's 2022 funds, a ruling upheld with finality in a COA *Decision* dated April 10, 2026, as well as a subsequent disallowance of the OVP's entire Php375,000,000.00 allocation for 2023. Parallel to these OVP findings, the COA issued critical audit observations on the Php112,500,000.00 in DepEd funds, flagging them for deficient documentation and irregular purposes, thereby confirming a cross-agency pattern of financial misconduct and a systematic failure of public accountability.⁶

⁵ A copy each of the TSN of the CGGPA hearings on September 18, 2024, September 25, 2024, October 17, 2024, November 5, 2024, November 20, 2024, December 9, 2024, and November 11, 2024, is hereto attached as Annexes "K" to "Q," respectively. See Annex "A," the TSN of the CGGPA hearing on November 25, 2024.

⁶ A copy each of Land Bank of the Philippines ("LBP") Check No. 0000244027 dated December 20, 2022, Disbursement Voucher ("DV") No. 2022-12-07222 dated December 20, 2022, LBP Check No. 000244053 dated January 31, 2023, DV No. 2023-01-00222 dated January 31, 2023, LBP Check No. 000245511 dated April 18, 2023, DV No. 2023-04-01791 dated April 10, 2023, LBP Check No. 0000245664 dated July 13, 2023, DV No. 2023-07-04361 dated July 13, 2023, OVP Liquidation Report No. 2022-12-152 dated January 10, 2023, OVP Updated Undated Accomplishment Report for the period December 21 to 31, 2022, OVP Undated Accomplishment Report for the period December 21 to 31, 2022, Proof of Submission dated January 10, 2023 to the Office of the President and received on January 13, 2023, Proof of Submission dated January 10, 2023 to the Senate President, Proof of Submission dated January 10, 2023 to the Speaker of the House of Representatives and received on January 13, 2023, Liquidation Report No. 2023-03-31 dated March 29, 2023, Proof of Submission dated April 3, 2023 to the Office of the President, Proof of Submission dated April 3, 2023 to the Senate President and received on April 11, 2023, Proof of Submission dated April 3, 2023 to the Speaker of the House of Representatives, OVP Accomplishment Report dated March 30, 2023 for the period February 6 to March 29, 2023, Liquidation Report No. 2023-07-133 dated July 11, 2023, Proof of Submission dated July 12, 2023 to the Office of the President and received on July 12, 2023, Proof of Submission dated July 12, 2023 to the Senate President and received on July 12, 2023, Proof of Submission dated July 12, 2023 to the Speaker of the House of Representatives and received on July 12, 2023, OVP Accomplishment Report dated July 11, 2023 for the period April 25 to June 30, 2023, Liquidation Report No. 2023-10-216 dated October 23, 2023, Proof of Submission dated October 10, 2023 to the Office of the President and received on October 11, 2023, Proof of Submission dated October 10, 2023 to the Senate President and received on October 11, 2023, Proof of Submission dated October 10, 2023 to the Speaker of the House of Representatives and received on October 12, 2023, OVP Accomplishment Report dated October 9, 2023 for the period July 14 to September 30, 2023, Documentary Evidence of Payments ("DEPs") with payee name "Milky Secuya," DEPs with payee name "Kokoy Villamin," DEPs with payee name "Mary Grace Piattos," DEPs with payee name "Irene Tan," DEPs 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 "N" to the Saballa, *et al.* Impeachment Complaint), DEPs showing the physical impossibility of actual disbursement (attached as Annex "O" to the Saballa, *et al.* Impeachment Complaint), DEPs bearing dates within periods that the OVP had no CF to disburse (attached as Annex "P" to the Saballa, *et al.* Impeachment Complaint), LBP Check No. 0000000453 dated February 20, 2023, DV No. 23-02-2987, LBP Check No. 0000000964 dated April 19, 2023,

- (c) The National Bureau of Investigation ("NBI"), in Questioned Documents Report No. 130-425 and 302-724 dated May 28, 2025, found indicia of fabrication in acknowledgment receipts submitted by the OVP and DepEd. Handwriting analysis revealed that, out of 36 receipts examined, multiple documents bore identical handwriting characteristics consistent with preparation by a limited number of individuals, undermining the claimed authenticity of the supporting liquidation documents.⁷
- (d) The Philippine Statistics Authority ("PSA") certified that a significant number of individuals listed in acknowledgment receipts do not exist in official civil registry records. Of 677 names in DepEd receipts, at least 398 had no corresponding birth, death, or marriage records. Of 1,992 names in OVP

Unnumbered and undated DV for 2nd Qtr. of CY 2023, LBP Check No. 0000002250 dated July 11, 2023, DV No. 23-07-10503 dated July 11, 2023, Liquidation Report No. 2023-03-30 dated March 31, 2023, Proof of Submission dated April 3, 2023 to the Office of the President and received on April 11, 2023, Proof of Submission dated April 3, 2023 to the Senate President and received on April 11, 2023, Proof of Submission dated April 31, 2023 to the Speaker of the House of Representatives and received on April 11, 2023, DepEd Accomplishment Report dated March 31, 2023 for the period February 20 to March 30, 2023, Liquidation Report No. 2023-06-30 dated June 30, 2023, Proof of Submission dated July 5, 2023 to the Office of the President and received on July 5, 2023 to the Senate President, Proof of Submission dated July 5, 2023 to the Speaker of the House of Representatives, DepEd Accomplishment Report dated June 30, 2023 for the period April 20 to June 29, 2023, Liquidation Report No. 2023-09-30 dated September 29, 2023, Proof of Submission dated October 9, 2023 to the Office of the President and received on October 11, 2023, Proof of Submission dated October 9, 2023 to the Senate President, Proof of Submission dated October 9, 2023 to the Speaker of the House Representatives, DepEd Accomplishment Report dated September 30, 2023 for the period July 12 to September 30, 2023, Certification dated January 1, 2024 issued by Col. Manaros M. Boransing II of the 1st Infantry (Tabak) Division, Philippine Army ("PA") for the success of the surveillance activities, Certification dated December 30, 2023 issued by Lt. Col. Carlos B. Sangdaan Jr. of the 5th Infantry (Star) Division, PA for the success of the surveillance activities, Certification dated December 5, 2023 issued by Lt. Col. Magtangol G. Panopio of the 7th Infantry (Kaugnay) Division, PA for the success of the surveillance activities, Undated letter to the Department of Education by the 9th Infantry (Spear) Division, PA, DepEd Order No. 001, s. 2023 dated January 9, 2023 on the Revised Designation of Undersecretaries and Assistant Secretaries to their Strands and Functional Areas of Responsibilities and Revised Signing Authorities, DV No. 23-04-5905 dated April 19, 2023, Credit Notice No. 2024-162 dated August 8, 2024, DEPs with signatures only (attached as Annex "W" to the Saballa, *et al.* Impeachment Complaint, DEPs showing physical impossibility of actual disbursement (attached as Annex "X" to the Saballa, *et al.* Impeachment Complaint), DEPs, different individuals, same handwriting (attached as Annex "Y" to the Saballa, *et al.* Impeachment Complaint), DEPs, different individuals, same signature (attached as Annex "Z" to the Saballa, *et al.* Impeachment Complaint), DEPs with payee name "Alice Crecensio," *Notice of Disallowance* No. 2024-002-100 (2022) dated August 8, 2024, COA Letter in compliance with Subpoena *Duces Tecum*, dated August 21, 2024 (attached as Annex "K" to the Saballa, *et al.* Impeachment Complaint), OVP Letter to Chairman Cordoba, August 21, 2024, Audit Observation Memorandum ("AOM") No. 2024-014 dated February 1, 2024, AOM No. 2024-015 dated February 1, 2024, Compliance letter dated April 19, 2024 in reference to AOM No. 2024-014 dated February 1, 2024, Compliance letter dated April 17, 2024 in reference to AOM No. 2024-015 dated February 1, 2024, DepEd Reply dated April 17, 2024, Certification dated April 4, 2024 issued by Col. Raymund Dante P. Lachica with regard to the confidential activities performed by the OVP, DepEd Reply dated April 17, 2024, AOM No. 2024-170 dated August 8, 2024, and AOM No. 2024-171 dated August 8, 2024 are hereto attached as Annexes "R" to "Q⁴," respectively. See Annexes "B" to "I".

⁷ A copy each of the NBI Questioned Documents Report No. 130-425 dated May 28, 2025 and Questioned Documents Report No. 302-724 dated May 28, 2025 are hereto attached as Annexes "R⁴" to "S⁴," respectively.

receipts, at least 1,287 individuals could not be verified. Notably, names such as “Mary Grace Piattos,” “Milky Secuya,” and “Kokoy Villamin” have no PSA records.⁸

- (e) Ramil Madriaga (“Mr. Madriaga”) executed an *Affidavit* dated November 29, 2025 and *Supplemental Affidavit* dated April 11, 2026, stating that he was a close aide of respondent and that she personally instructed him to deliver OVP confidential funds to various locations in Laguna and Quezon City to persons not lawfully authorized to receive the funds.⁹ He complied with these instructions and asserted that the funds were, in fact, disbursed in less than 24 hours, contrary to reports indicating an 11-day period.

Respondent also engaged in acts tending to suppress evidence and obstruct legislative inquiry. Under her directive, her Chief of Staff, Atty. Zuleika Lopez, wrote the COA, urging it not to comply with a subpoena *duces tecum* issued in connection with the investigation of the House of Representatives on the disposition of the OVP and DepEd confidential funds. Despite this, the COA complied with the subpoena.

As shown above, the evidence demonstrates a clear and deliberate pattern of misuse, misappropriation, and fraudulent liquidation of confidential funds under respondent’s authority. The speed of disbursements, the absence of credible documentation, the use of unauthorized intermediaries, the fabrication of supporting records, and the deliberate attempt to suppress incriminating evidence all point to a systematic scheme designed to circumvent legal safeguards and conceal the unlawful diversion of public funds. Accordingly, respondent is liable for culpable violation of the Constitution,¹⁰ graft and corruption, and betrayal of public trust.

⁸ A copy each of the PSA Certification dated December 8, 2024 and PSA Certification dated December 11, 2024 are hereto attached as Annexes “T4” to “U4,” respectively.

⁹ A copy of Ramil Madriaga’s *Affidavit* dated November 29, 2025 and *Supplemental Affidavit* dated April 11, 2026 are hereto attached as Annexes “V4” to “W4,” respectively. The Certification of Appearance dated April 7, 2026, IBP IDs of Atty. Cynthia P. Viñas-Pantoñal and Atty. Raymund P. Palad, Logbook with Entry No. 001344 dated November 29, 2025, Photos of lawyer’s visit to Ramil Madriaga, Certification dated March 26, 2026, Driver’s License and PhilHealth ID of Ramil Madriaga, Oath of Office of Atty. Cynthia P. Viñas-Pantoñal dated December 11, 2023, and Certification by the Hon. Byron G. San Pedro, Executive Judge of the Regional Trial Court – Taguig City dated December 11, 2023, are hereto attached as Annexes “X4” to “F5”.

¹⁰ Article II, Section 27. The State shall maintain honesty and integrity in the public service and take positive and effective measures against graft and corruption.

Article II, 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.

Article III, 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.

Article XI, 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.

ARTICLE II

RESPONDENT VICE PRESIDENT SARA Z. DUTERTE COMMITTED CULPABLE VIOLATION OF THE CONSTITUTION AND BETRAYED PUBLIC TRUST WHEN SHE:

- A. AMASSED UNEXPLAINED WEALTH MANIFESTLY DISPROPORTIONATE TO HER LAWFUL INCOME AND EARNINGS DURING HER INCUMBENCY AS A PUBLIC OFFICIAL;**
- B. FAILED TO FULLY AND TRUTHFULLY DISCLOSE ALL HER AND HER SPOUSE'S ASSETS, LIABILITIES, AND NET WORTH IN HER STATEMENT OF ASSETS, LIABILITIES, AND NET WORTH ("SALN"), INCLUDING IN HER SALN FOR THE YEARS 2022, 2023, AND 2024; AND**
- C. FAILED TO DIVEST, AND INSTEAD, WILLFULLY CONTINUED, ALL HER BUSINESS INTERESTS DURING HER TENURE AS VICE PRESIDENT FOR THE YEARS 2022, 2023, 2024, AND 2025.**

Article XI, Section 17 of the 1987 Constitution requires public officers to declare their assets, liabilities, and net worth:

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.

To this end, Republic Act ("R.A.") No. 6713, otherwise known as the Code of Conduct and Ethical Standards for Public Officials and Employees, mandates:

Section 8. Statements and Disclosure. — Public officials and employees have an obligation to accomplish and submit declarations under oath of, and the public has the right to know, their assets, liabilities, net worth and financial and business interests including those of their spouses and of unmarried children under eighteen (18) years of age living in their households.

(A) *Statements of Assets and Liabilities and Financial Disclosure.* — All public officials and employees, except those who serve in an honorary capacity, laborers and casual or temporary workers, shall file under oath their Statement of Assets, Liabilities and Net Worth and a Disclosure of Business Interests and Financial Connections and those of their spouses and unmarried children under eighteen (18) years of age living in their households.

The two documents shall contain information on the following:

- (a) real property, its improvements, acquisition costs, assessed value and current fair market value;
- (b) personal property and acquisition cost;
- (c) all other assets such as investments, cash on hand or in banks, stocks, bonds, and the like;
- (d) liabilities; and
- (e) all business interests and financial connections.

This statutory obligation is echoed in R.A. No. 3019, otherwise known as the Anti-Graft and Corrupt Practices Act:

Section 7. Statement of assets and liabilities. — Every public officer, within thirty days after assuming office, thereafter, on or before the fifteenth day of April following the close of every calendar year, as well as upon the expiration of his term of office, or upon his resignation or separation from office, shall prepare and file with the office of the corresponding Department Head, or in the case of a Head of department or Chief of an independent office, with the Office of the President, a true, detailed sworn statement of assets and liabilities, including a statement of the amounts and sources of his income, the amounts of his personal and family expenses and the amount of income taxes paid for the next preceding calendar year: *Provided*, That public officers assuming office less than two months before the end of the calendar year, may file their first statement on or before the fifteenth day of April following the close of the said calendar year.

In violation of the foregoing and other relevant laws, respondent amassed unexplained wealth disproportionate to her lawful income, which was not fully and truthfully disclosed in her SALN for the years when she was a public official.

Respondent amassed wealth manifestly disproportionate to her lawful income and earnings during her incumbency as a public official

Respondent began her career in elective public office when she won as Vice Mayor of Davao City in 2007. Since then, she has held government positions, except for the years 2013 to 2015, when she was a private citizen.

As Vice Mayor, respondent's approximate annual salaries were as follows:

VICE MAYOR	
YEAR	APPROXIMATE ANNUAL SALARY
2007	Php321,540.00 ¹¹
2008	Php353,688.00 ¹²
2009	Php468,312.00 ¹³

Respondent was elected as Mayor of Davao City in 2010. As Mayor, respondent's approximate annual salaries were as follows:

MAYOR	
YEAR	APPROXIMATE ANNUAL SALARY
2010	Php683,316.00 ¹⁴
2011	Php815,328.00 ¹⁵
2012	Php947,352.00 ¹⁶
2013	Not in public office
2014	Not in public office
2015	Not in public office
2016	Php1,156,248.00 ¹⁷
2017	Php1,411,212.00 ¹⁸
2018	Php1,720,248.00 ¹⁹
2019	Php2,136,516.00 ²⁰
2020	Php2,179,248.00 ²¹
2021	Php2,221,980.00 ²²

¹¹ Executive Order ("E.O.") No. 611, s. 2007. Based on the monthly rate of Php26,795.00 for Salary Grade ("SG") 28, Step 1.

¹² E.O. No. 719, s. 2008. Based on the monthly rate of Php29,474.00 for SG 28, Step 1.

¹³ E.O. No. 811, s. 2009. Based on the monthly rate of Php39,026.00 for SG 28, Step 1.

¹⁴ E.O. No. 900, s. 2010. Based on the monthly rate of Php56,943.00 for SG 30, Step 1.

¹⁵ E.O. No. 40, s. 2011. Based on the monthly rate of Php67,944.00 for SG 30, Step 1.

¹⁶ E.O. No. 76, s. 2012. Based on the monthly rate of Php78,946.00 for SG 30, Step 1.

¹⁷ E.O. No. 201, s. 2016, Sec. 3 (First Tranche). Based on the monthly rate of Php96,354.00 for SG 30, Step 1.

¹⁸ *Id.*, Sec. 3 (Second Tranche). Based on the monthly rate of Php117,601.00 for SG 30, Step 1.

¹⁹ *Id.*, Sec. 3 (Third Tranche). Based on the monthly rate of Php143,534.00 for SG 30, Step 1.

²⁰ *Id.*, Sec. 3 (Fourth Tranche). Based on the monthly rate of Php178,043.00 for SG 30, Step 2.

²¹ R.A. No. 11466, Sec. 7 (First Tranche). Based on the monthly rate of Php181,604.00 for SG 30, Step 2.

²² *Id.*, Sec. 7 (Second Tranche). Based on the monthly rate of Php185,165.00 for SG 30, Step 2.

In 2022, respondent was elected as Vice President, with approximate annual salaries, as follows:

VICE PRESIDENT	
YEAR	APPROXIMATE ANNUAL SALARY
2022	Php3,909,684.00 ²³
2023	Php3,983,448.00 ²⁴
2024	Php4,079,052.00 ²⁵

Based on these figures, the total salary income (constitutive of the bulk of aggregate lawful income in government) of respondent as a public official for the years 2007 to 2009 (as Vice Mayor), 2010 to 2012 and 2016 to 2021 (as Mayor), and 2022 to 2024 (as Vice President) is approximately Php30,000,000.00.

Aside from her accumulated salary as a public official, respondent also declared various companies and/or business interests in her SALNs, which may constitute additional sources of income: (a) Metro City Chow Foods Corporation²⁶ (formerly, City Hall King Chow Foods Corporation²⁷), (b) Gencorp Industries, Inc.²⁸ (formerly, Timesquare Bee Foods Corp. and Great Jolly Times Food Corp.), (c) Carpio Lawyers²⁹ (formerly, Carpio & Duterte Lawyers), (d) 888 Bistro, (e) CALE88 FOODS Corp.,³⁰ (f) Madayaw Fisheries Corp.,³¹ (g) Mati City Ice Plant and Cold Storage, Inc.,³² (h) Amianan Shores, Inc.,³³ (i) Geometry Security and Investigation Agency, Inc.,³⁴ (j) Cabletow 88 Shipping and Marine Services, Inc.,³⁵ (k) Davao New

²³ *Id.*, Sec. 7 (Third Tranche). Based on the monthly rate of Php325,807.00 for SG 32, Step 1.

²⁴ *Id.*, Sec. 7 (Fourth Tranche). Based on the monthly rate of Php331,954.00 for SG 32, Step 1.

²⁵ E.O. No. 64, Section 3 (First Tranche). Based on the monthly rate of Php339,921.00 for SG 32, Step 1.

²⁶ A copy of Metro City Chow Foods Corporation's Articles of Incorporation ("AOI") is hereto attached as Annex "G⁵". A copy each of Metro City Chow Foods Corporation's General Information Sheets ("GIS") for the years 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025 with amendments is hereto attached as Annexes "H⁵" to "Q⁵," respectively.

²⁷ A copy each of City Hall King Chow Foods Corporation's GIS for the years 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019 (May), 2019 (June), 2020, and 2021 is hereto attached as Annexes "R⁵" to "F⁶," respectively.

²⁸ A copy each of Gencorp Industries, Inc.'s GIS for the years 2021, 2022 with amendments, 2023, 2024, and 2025 is hereto attached as Annexes "G⁶" to "L⁶," respectively.

²⁹ A copy of Carpio Lawyers' Articles of Partnership is hereto attached as Annex "M⁶".

³⁰ A copy each of CALE88 FOODS Corp.'s GIS for the years 2022, with amendments received on September 2022 and February 2023, 2023, 2024, and 2025 is hereto attached as Annexes "N⁶" to "S⁶," respectively.

³¹ A copy each of a Certification of Non-Registration of Company for Madayaw Fisheries Corp. and Madayaw Fisheries Inc.'s AOI is hereto attached as Annexes "T⁶" and "U⁶," respectively.

³² A copy each of Mati City Ice Plant and Cold Storage Inc.'s GIS for the years 2024, 2025, and 2026 is hereto attached as Annexes "V⁶" to "X⁶," respectively.

³³ A copy of Amianan Shores Inc.' AOI is hereto attached as Annex "Y⁶".

³⁴ A copy each of Geometry Security and Investigation Agency, Inc.'s GIS for the years 2023, 2024, and 2025 is hereto attached as Annexes "Z⁶" to "B⁷," respectively.

³⁵ A copy of Cabletow 88 Shipping and Marine Services, Inc.'s AOI is hereto attached as Annex "C⁷".

Royal Taipan Corp. (formerly, Davao Emerging Taipans Corp.), (l) Davao Bounty Times Food Corp., (m) SGT Fortune Horse Corp.,³⁶ (n) CYKT Inc.,³⁷ (o) 3 Kids Inc.,³⁸ and (p) Zelta Matiem Salon,³⁹ among others.

The Audited Financial Statements ("AFS")⁴⁰ of companies where respondent and her spouse have business interests (as stated in respondent's SALNs) show that the combined income and losses of the corporations resulted in a net loss. In short, the estimated total salary income of respondent from 2007 to 2024 remains at approximately Php30,000,000.00, or even less, if the losses incurred by these corporations are considered.

However, based on her SALNs for the years 2007 to 2024, respondent declared her and her spouse's net worth as follows:

Year	Net Worth
2007	Php7,250,497.00 ⁴¹
2008	Php18,493,616.65 ⁴²
2009	Php18,281,264.65 ⁴³
2010	Php16,242,886.65 ⁴⁴
2011	Php14,271,148.46 ⁴⁵
2012	Php22,116,101.93 ⁴⁶
2013	Not in public office
2014	Not in public office
2015	Not in public office
2016	Php34,895,997.00 ⁴⁷
2017	Php44,828,759.00 ⁴⁸

³⁶ Tagged as "Retired" in SALNs for 2020, 2021, 2022, and 2023.

³⁷ Tagged as "For Dissolution" in SALNs for 2012, 2016, and 2017.

³⁸ Tagged as "Not Existing" in SALN for 2012. Declared as "3 Kids Inc. Trucking Services, Inc." and tagged as "For Dissolution" in SALN for 2016.

³⁹ Tagged as "For Retirement" in SALN for 2012 and "Closed" in SALN for 2016.

⁴⁰ A copy each of Metro City Chow Foods Corp.'s AFS for the years 2017, 2018, 2019, 2020, 2021, 2022, 2023, and 2024 is hereto attached as Annexes "D7" to "K7," respectively; A copy each of City Hall King Chow Foods Corp.'s AFS for the years 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, and 2020 is hereto attached as Annexes "L7" to "Y7," respectively; A copy each of GenCorp Industries, Inc.'s AFS for the years 2021, 2022, 2023, and 2024 is hereto attached as Annexes "Z7" to "C8," respectively; A copy each of CALE88 FOODS Corp.'s AFS for the years 2021, 2022, and 2023 is hereto attached as Annexes "D8" to "F8," respectively; A copy each of Mati City Ice Plant and Cold Storage, Inc.'s Income Tax Return for the years 2023 and 2024 is hereto attached as Annexes "G8" to "H8," respectively; A copy each of Geometry Security and Investigation Agency, Inc.'s AFS for the year 2024 and 2025 is hereto attached as Annexes "I8" to "J8," respectively.

⁴¹ A copy of respondent's SALN for 2007 is hereto attached as Annex "K8".

⁴² A copy of respondent's SALN for 2008 is hereto attached as Annex "L8".

⁴³ A copy of respondent's SALN for 2009 is hereto attached as Annex "M8".

⁴⁴ A copy of respondent's SALN for 2010 is hereto attached as Annex "N8".

⁴⁵ A copy of respondent's SALN for 2011 is hereto attached as Annex "O8".

⁴⁶ A copy of respondent's SALN for 2012 is hereto attached as Annex "P8".

⁴⁷ A copy of respondent's SALN for 2016 is hereto attached as Annex "Q8".

⁴⁸ A copy of respondent's SALN for 2017 is hereto attached as Annex "R8".

2018	Php49,699,728.00 ⁴⁹
2019	Php55,613,051.00 ⁵⁰
2020	Php56,583,735.10 ⁵¹
2021	Php65,308,841.00 ⁵²
2022	Php71,058,841.00 ⁵³
2023	Php77,508,841.00 ⁵⁴
2024	Php88,512,370.22 ⁵⁵

From 2007 to 2024, the net worth of respondent and her spouse rose from Php7,250,497.00 to Php88,512,370.22, or a total increase of around Php80,000,000.00. However, as shown earlier, the lawful income of respondent and her spouse for the same period only amounts to roughly Php30,000,000.00. The difference between their lawful income of Php30,000,000.00 and the increase in their net worth of around Php80,000,000.00, resulting in a disparity of approximately Php50,000,000.00, clearly constitutes unexplained wealth.

The disproportion becomes even more staggering when compared against actual bank transactions. Official records from the Anti-Money Laundering Council ("AMLC") show that billions of pesos were deposited in accounts associated with respondent and her spouse from 2007 to 2024. The AMLC flagged a total amount of at least Php6.7 Billion as covered or suspicious transactions; of this aggregate amount, around Php4.4 Billion was identified as inflow transactions and roughly Php1.5 Billion was identified as outflow transactions.⁵⁶

The AMLC's: (1) Covered Transactions Reports ("CTRs")⁵⁷ and Suspicious Transaction Reports ("STRs")⁵⁸ for 2006 to 2025; (2) Financial Intelligence Reports on Vice President Sara Duterte-Carpio;⁵⁹ and (3) Investigation Reports on: (a) Manases Carpio, and (b) Sara Duterte-Carpio and Manases Carpio⁶⁰ reveal the following transactions worth billions of pesos:

⁴⁹ A copy of respondent's SALN for 2018 is hereto attached as Annex "S".

⁵⁰ A copy of respondent's SALN for 2019 is hereto attached as Annex "T".

⁵¹ A copy of respondent's SALN for 2020 is hereto attached as Annex "U".

⁵² A copy of respondent's SALN for 2021 is hereto attached as Annex "V".

⁵³ A copy of respondent's SALN for 2022 is hereto attached as Annex "W".

⁵⁴ A copy of respondent's SALN for 2023 is hereto attached as Annex "X".

⁵⁵ A copy of respondent's SALN for 2024 is hereto attached as Annex "Y".

⁵⁶ A copy of the AMLC letter dated April 22, 2026 is hereto attached as Annex "Z".

⁵⁷ A copy each of the CTR Database with the criteria "Sara & Zimmerman, Sara & Duterte, Sara & Carpio" and "Manases & Carpio, Mans & Carpio" are hereto attached as Annex "A" and Annex "A-1," respectively.

⁵⁸ A copy each of the STR Database with the criteria "Sara & Zimmerman, Sara & Duterte, Sara & Carpio" and "Manases & Carpio, Mans & Carpio" are hereto attached as Annex "B" and Annex "B-1," respectively.

⁵⁹ A copy of the Financial Intelligence Reports on Vice President Sara Duterte-Carpio is hereto attached as Annex "C".

⁶⁰ A copy of the Investigation Reports on: (a) Manases Carpio, and (b) Sara Duterte-Carpio and Manases Carpio is hereto attached as Annex "D".

	Sara Duterte-Carpio	Manases Carpio	Total for Both
Number of CTRs	313	317	630
Number of STRs	17	16	33
Total Amount Involved	3,772,769,972.48	2,998,466,740.47	6,771,227,712.95
Total Amount of Inflow	1,832,539,360.45	2,592,904,434.24	4,425,443,794.69
Total Amount of Outflow	1,211,365,529.75	343,315,781.07	1,554,681,310.82
Undetermined Inflow and Outflow Transactions			791,102,607.44

The magnitude of these transactions demonstrates that the billions of pesos flowing through the accounts of respondent and her spouse cannot be reconciled with their declared lawful income, particularly, respondent's total salary income of just approximately Php30,000,000.00.

The amount of funds acquired and owned by respondent and her spouse deposited in various bank accounts totaling billions of pesos are manifestly disproportionate to their lawful income and are thereby presumed, under the law, as unlawfully acquired or ill-gotten wealth.

Under R.A. No. 1379, property acquired by a public officer that is manifestly disproportionate to lawful income is presumed unlawfully acquired. Section 8 of R.A. No. 3019 reinforces this rule by imposing upon the respondent the burden to explain such disproportion, failing which the wealth is deemed ill-gotten. Jurisprudence is unequivocal: unexplained wealth grossly out of proportion to legitimate income is *prima facie* proof of unlawful acquisition, and warrants forfeiture (*Heirs of Ligot v. Republic*,⁶¹ *Philippine National Bank v. Gancayco*⁶²). Measured against these controlling standards, respondent's wealth, running into billions of pesos, cannot be reconciled with her lawful income. No lawful explanation exists. By operation of law, and consistent with settled doctrine, such wealth is presumed, and deemed, ill-gotten.

Former Senator Antonio Trillanes IV disclosed that a significant portion of this wealth was sourced from illegal activities, including funds linked to illegal drug operations and associations with drug syndicates, and identified specific transactions and individuals connected to the drug trade.

⁶¹ G.R. Nos. 257827, 257940, 258109, and 259593 dated March 5, 2025.

⁶² G.R. No. L-18343, September 30, 1965.

These disclosures are corroborated by the findings of the AMLC, which flagged billions of pesos in transactions involving respondent and her spouse, reflecting patterns consistent with money laundering and predicate offenses. Notably, a certain name identified in the AMLC records corresponds with those publicly disclosed by Trillanes.⁶³ Taken together, these facts establish a pattern of criminal enrichment and demonstrate that respondent's wealth is manifestly unlawful, grossly disproportionate to legitimate income, and constitutes ill-gotten wealth—clear grounds for impeachment.

Relevantly, the Investigation Reports⁶⁴ from the AMLC on respondent and her spouse indicate that the bank transactions involving their bank accounts may have been involved in predicate offenses of money laundering, particularly: (a) drug trafficking and related offenses; (b) graft and corrupt practices; and (c) malversation of public funds.

Respondent failed to fully and truthfully disclose all her and her spouse's assets, liabilities, and net worth in her SALN, including in her SALNs for the years 2022, 2023, and 2024

While respondent filed her SALNs for the periods during which she served as a public officer, her declarations were grossly inaccurate and misrepresented the true amount of her and her spouse's net worth, assets, and cash on hand/cash in bank, as shown below:

Year	Real Assets	Personal Assets	Cash on Hand/Cash in Bank	TOTAL ASSETS	TOTAL LIABILITIES	TOTAL NET WORTH
2007	3,774,697.00	5,475,800.00	2,000,000.00	9,250,497.00	2,000,000.00	7,250,497.00
2008	15,563,468.65	4,705,148.00	2,000,000.00	20,268,616.65	1,775,000.00	18,493,616.65
2009	10,802,668.65	9,368,596.00	2,800,000.00	20,171,264.65	1,890,000.00	18,281,264.65
2010	10,802,668.65	10,748,218.00	3,661,622.00	21,550,886.65	5,308,000.00	16,242,886.65
2011	10,802,668.65	11,017,721.80	3,931,125.80	21,820,390.43	7,549,242.00	14,271,148.45
2012	18,591,708.93	12,217,128.00	4,320,532.00	30,808,836.93	8,692,735.00	22,116,101.93
2013	NOT IN PUBLIC OFFICE					
2014	NOT IN PUBLIC OFFICE					
2015	NOT IN PUBLIC OFFICE					
2016	30,548,891.00	11,301,560.00	3,750,760.00	41,850,451.00	6,954,454.00	34,895,997.00
2017	30,548,891.00	20,593,056.00	6,368,506.00	51,141,947.00	6,313,188.00	44,828,759.00
2018	36,798,891.00	19,019,950.00	3,795,000.00	55,818,841.00	6,119,113.00	49,699,728.00
2019	39,798,891.00	19,274,950.00	None	59,073,841.00	3,460,790.00	55,613,051.00
2020	39,798,891.00	19,274,950.00	None	59,073,841.00	2,490,105.90	56,583,735.10
2021	48,958,891.00	23,849,950.00	None	72,808,841.00	7,500,000.00	65,308,841.00
2022	50,958,891.00	23,849,950.00	None	74,808,841.00	3,750,000.00	71,058,841.00
2023	54,808,891.00	25,249,950.00	None	80,058,841.00	2,550,000.00	77,508,841.00
2024	66,808,891.00	31,653,479.22	None	98,462,370.00	9,950,000.00	88,512,370.22

Contrary to her declarations in her SALNs, respondent and her spouse owned and acquired billions of pesos, which were deposited from

⁶³ A copy of former Senator Antonio Trillanes IV's *Sinumpaang Salaysay* dated April 21, 2026 and its annexes is hereto attached as Annex "E⁹".

⁶⁴ See Annex "D⁹".

2007 to 2024 in their bank accounts. These funds deposited in their bank accounts were not declared in respondent's SALNs, including in her SALNs covering the years 2022, 2023, and 2024. Despite the billions of pesos deposited in respondent and her spouse's bank accounts from 2007 to 2024, these deposits were not declared as "cash on hand," "cash in bank," or "other personal assets" in respondent's SALNs, including in her SALNs for 2022, 2023, and 2024.

The highest amount of "cash on hand"/"cash in bank" declared in respondent's SALNs is only around Php6,000,000.00. Notably, no cash, whether on hand or in bank, was declared in her SALNs from 2019 to 2024. This period encompasses her final three years as Mayor of Davao City and her first three years as Vice President of the Republic—a span of time during which she possessed the singular, albeit suspicious, "distinction" of managing hundreds of millions in confidential funds, while apparently possessing not a single centavo of her own.

Respondent failed to divest, and instead, willfully continued, all her business interests during her tenure as Vice President for the years 2022, 2023, 2024, and 2025

Despite her election as Vice President in 2022, respondent maintained her shareholdings in, as well as her position as a director of, Metro City Chow Foods Corporation for the years 2022, 2023, 2024, and 2025.

Records of the Securities and Exchange Commission⁶⁵ reveal that respondent is an incorporator⁶⁶ of Metro City Chow Foods Corporation and a director and minority stockholder thereof for the years 2022, 2023, 2024, and 2025, having 20% ownership of the company (500 shares). The same records show that respondent was a member of its Executive Committee and was listed as part of its Compensation Committee for the same years. In fact, respondent herself disclosed this business interest in her SALNs for the years 2022, 2023, 2024, and 2025.

However, Article VII, Section 13 of the Constitution expressly prohibits the Vice President and other high-ranking government officials from directly or indirectly participating in any business:

Section 13. The President, Vice-President, the Members of the Cabinet, and their deputies or assistants shall not, unless otherwise provided in this Constitution, hold any other office or employment during their tenure. They shall not, during said tenure, directly or indirectly, practice any other profession, participate in any

⁶⁵ See the GIS of Metro Chow Foods Corporation for the years 2022, 2023, 2024, and 2025, hereto attached as Annexes "L⁵" to "P⁵," respectively.

⁶⁶ See the AOI of Metro Chow Foods Corporation, hereto attached as Annex "G⁵"

business, or be financially interested in any contract with, or in any franchise, or special privilege granted by the Government or any subdivision, agency, or instrumentality thereof, including government-owned or controlled corporations or their subsidiaries. They shall strictly avoid conflict of interest in the conduct of their office.

Taking the foregoing into consideration, respondent clearly committed culpable violation of Article XI, Section 17 of the Constitution and betrayed public trust by amassing wealth manifestly disproportionate to her lawful income and earnings during her incumbency as a public officer and failing to disclose her and her spouse's actual assets, properties, business interests, and net worth in her SALNs. Also, by willfully maintaining her shareholdings and her seat on a corporate board in open defiance of Article VII, Section 13 of the Constitution, respondent has fostered a climate where private business interests and public duty are indistinguishably blurred, providing a convenient veil for the billions in unexplained financial transactions. This fundamental conflict of interest proves that respondent has prioritized personal enrichment over her constitutional oath, demonstrating a profound lack of the moral and legal fitness required to hold the second-highest office in the land.

ARTICLE III

RESPONDENT VICE PRESIDENT SARA Z. DUTERTE COMMITTED BRIBERY, GRAFT AND CORRUPTION, CULPABLE VIOLATION OF THE CONSTITUTION, AND BETRAYED PUBLIC TRUST WHEN SHE GAVE MONETARY GIFTS OR PAYMENTS TO DEPED OFFICIALS TO INDUCE THE VIOLATION AND CIRCUMVENTION OF PROCUREMENT AND OTHER RELATED LAWS.

DepEd Undersecretary for Human Resource and Organizational Development Gloria Jumamil-Mercado ("Usec. Mercado") was appointed to her position in August 2022 and was designated as Head of Procuring Entity ("HOPE") in February 2023. Soon after her appointment as HOPE, between February 2023 and September 2023, Usec. Mercado received nine envelopes containing Php50,000.00 in cash labeled "HOPE." These envelopes with cash were repeatedly handed to her by DepEd Assistant Secretary Sunshine Fajarda ("Asec. Fajarda"), who told Usec. Mercado that these came from respondent.

The circumstances under which the envelopes were given indicate that they were intended to influence her decision as HOPE, as the official responsible for approving all the decisions of the Bids and Awards Committee on behalf of the DepEd Secretary. In fact, when Usec. Mercado refused to heed the request of Assistant Secretary Reynold Munsayac, a close associate of respondent, to disregard procurement rules, Usec.

Mercado was urged by then Vice Presidential Chief of Staff Atty. Zuleika Lopez to tender her resignation.

Resty Osias ("Dir. Osias") assumed his office as DepEd Director IV on January 17, 2023. Between April 2023 to September 2023, when DepEd still had access to confidential funds, Asec. Fajarda handed Dir. Osias four envelopes, each containing Php12,000.00 to Php15,000.00 in cash.

In 2023, DepEd Chief Accountant Rhunna Catalan received nine envelopes containing Php25,000.00 each from Asec. Fajarda, who represented to her that the amounts were allowances from respondent. Such "allowances" were never given prior to the release of the confidential funds, indicating a direct link between the availability of such funds and the distribution of these monetary benefits.

The respective testimonies of Usec. Mercado (September 25, 2024),⁶⁷ Dir. Osias (October 17, 2024),⁶⁸ and Ms. Catalan (November 5, 2024)⁶⁹ during the CGGPA hearings establish that during respondent's tenure as DepEd Secretary, Asec. Fajarda gave these officials monies in envelopes, expressly representing that the funds originated from respondent, to influence them to act in accordance with her directives, particularly in relation to procurement and financial approvals.

Respondent's acts constitute a violation of Article 212 (Corruption of Public Officials) in relation to Article 210 (Direct Bribery) of the Revised Penal Code, by giving or causing the giving of monetary inducements to public officials in connection with the performance of their official duties. These acts also constitute graft and corrupt practices under R.A. No. 3019, as respondent induced and influenced public officers to commit violations of procurement laws, resulting in undue injury to the government and the grant of unwarranted benefits, advantage, or preference in the discharge of official functions.

Respondent's actions further constitute betrayal of public trust, a ground for impeachment intended to cover all manner of misconduct that renders an official unfit to continue in office. The testimony of Usec. Mercado, showing that her refusal to compromise procurement rules led to an immediate demand for her resignation by the respondent's Chief of Staff, reveals a pattern of administrative weaponization. Using public funds to bribe officials, and subsequently punishing those who exhibit integrity, is a gross perversion of the Vice Presidency. Such conduct diminishes the dignity of the office and destroys the people's confidence in the government's ability to manage public resources honestly and transparently.

⁶⁷ TSN of the House of Representatives' CGGPA dated September 25, 2024, refer to Annex "L".

⁶⁸ TSN of the House of Representatives' CGGPA dated October 17, 2024, refer to Annex "M".

⁶⁹ A copy of the TSN of the House of Representatives' CGGPA dated November 5, 2024 is hereto attached as Annex "N".

Respondent's acts also constitute culpable violation of the Constitution, specifically Article XI, Section 1, which mandates that public officers must, at all times, be accountable to the people and serve them with utmost responsibility and integrity. When the Vice President utilizes cash inducements to pressure subordinates into signing liquidation reports without supporting documentation, as admitted by Ms. Catalan, she effectively undermines the constitutional mandate of the COA and the House of Representatives' power of the purse. This is a willful and intentional subversion of the rule of law, transcending mere administrative oversight and reaching the level of a high crime that strikes at the heart of our democratic institutions.

ARTICLE IV

RESPONDENT VICE PRESIDENT SARA Z. DUTERTE COMMITTED CULPABLE VIOLATION OF THE CONSTITUTION, HIGH CRIMES, AND BETRAYED PUBLIC TRUST BY CONTRACTING FOR THE ASSASSINATION OF THE PRESIDENT, THE FIRST LADY, AND THE FORMER SPEAKER OF THE HOUSE, BY MAKING GRAVE THREATS, AND BY ACTIVELY INCITING SEDITION AGAINST THE REPUBLIC.

Respondent contracted for the assassination of the President, the First Lady, and the Former Speaker of the House

On November 23, 2024, during an online media briefing, respondent publicly declared that she hired an assassin to murder President Ferdinand Marcos, Jr., First Lady Liza Araneta-Marcos, and former Speaker of the House of Representatives Ferdinand Martin Romualdez:

[M]ay 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. Nag-bilin na ako ma'am. Pag mamatay ako, sabi ko, huwag ka tumigil hanggang hindi mo mapatay sila and then he said yes.⁷⁰

Respondent's conduct represents a radical and dangerous departure from the constitutional duties of the Vice Presidency. In fact, her explicit declaration not only gained traction in the local news, but also captured the attention of international media outlets.⁷¹ It also prompted the Executive

⁷⁰ The flash drive containing several videos, including the video of respondent's media briefing on November 23, 2024 saved under the filename "November 23, 2024" is hereto attached as Annex "F9".

⁷¹ Philippines VP Sara Duterte threatens Marcos assassination if she is killed, 23 November 2024, See <https://www.aljazeera.com/news/2024/11/23/philippines-vp-sara-duterte-threatens-marcos-assassination-if-she-is-killed>; Philippines vice president publicly threatens to have nation's president assassinated, 23 November 2024, See <https://www.cbsnews.com/news/sara-duterte-ferdinand-marcos-jr-philippines-assassination-threat/>; Philippine vice president says she would

Secretary to refer this active threat to the Presidential Security Command for immediate proper action.⁷² At the directive of the Department of Justice, the NBI likewise conducted an investigation. The NBI confirmed that threats—direct or indirect—against the life of the President are treated with the highest degree of urgency by law enforcement agencies, and are, at all times, considered matters of the gravest national concern.⁷³

On November 26, 2024, three days after she publicly declared that she contracted an assassin to kill the President, First Lady, and former House Speaker Ferdinand Martin Romualdez, respondent reiterated and confirmed in an interview that she indeed talked to a person to carry out the act:

VP Sara: 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?

VP Sara: Yes.

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

VP Sara: Yes, yes, yes.⁷⁴

The fact that respondent contracted an assassin no longer requires further proof, as it is already an established matter in light of her own public admissions. Respondent neither retracted these statements nor denied having said them. Instead, she defends this assassination plot, claiming that it is still subject to the condition that she must first be killed. However, the existence of an alleged condition attached to respondent's statement does not negate the fact of an unlawful agreement or solicitation. Indeed, the offense charged is the very act of contracting an assassin to kill the President, the First Lady, and the former Speaker of the House. This, in itself, constitutes direct and compelling evidence of her intent and participation in the unlawful act.

have Marcos assassinated if she is killed, 23 November 2024, See <https://edition.cnn.com/2024/11/23/asia/philippines-duterte-marcos-intl-hnk>; Philippines boosts security after VP's assassination threat against president, 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/>; Philippine VP Sara Duterte makes big statement. She says, 'If I die...', 23 November 2024, See <https://www.hindustantimes.com/world-news/philippine-vp-sara-dutertes-big-statement-death-assassination-threat-president-marcos-101732360677124.html>; Philippine VP's assassination threat against president 'affects national security', 24 November 2024, See bangkokpost.com/world/2907805/philippine-vps-assassination-threat-against-president-affects-national-security.

⁷² A copy of the *Affidavit of Investigation* is hereto attached as Annex "G".

⁷³ *Id.*

⁷⁴ Video of respondent's interview on November 26, 2024, saved under the filename "November 26, 2024" in the flash drive attached as Annex "F".

Grave Threats

Respondent's liability for grave threats is distinct from and in addition to her act of contracting an assassin, which, in itself, constitutes a separate high crime. The public announcement of that act is an independently punishable offense under the law. It is respondent's deliberate, public, and equivocal declaration on November 23, 2024 that she contracted an assassin that constitutes the offense of grave threats.

However, respondent's threat did not arise in isolation. It was preceded and reinforced by respondent's statements on October 18, 2024, where she expressed her violent intent to cut off the head of the President:

- (a) "Gusto ko tanggalin yung ulo niya"
- (b) "I imagine myself cutting his head";
- (c) "So noon, narealize ko toxic na di ba, ganyan na 'yung imagination mo, sinasakal mo na yung tao. Then I said this is over";
- (d) "Hindi marunong maging Presidente ang nakaupo, kasalanan ko ba iyon";
- (e) "Hindi ko alam. Isang beses sinabihan ko talaga si Sen. Imee (Marcos), 'pag 'di tumigil, huhukayin ko ang tatay ninyo at itatapon ko sya sa West Philippine Sea"; and
- (f) "Kung president niyo siya okay lang. Ako hanggang vice president lang ako, hanggang number 2 lang itong bansa na ito, wala itong number 1 para sa akin."⁷⁵

Even the NBI did not take these threats lightly and charged respondent with three counts of grave threats (Article 282 of the Revised Penal Code) for making these statements.

Political Destabilization and the High Crimes of Sedition and Insurrection

Respondent's past actions, as well as that of her family's, reveal that the threat she made on November 23, 2024 was not an isolated incident, nor a one-time emotional meltdown.

During a speech on January 28, 2024, respondent's brother urged President Marcos to remember the Romanovs, Mussolini, and what

⁷⁵ Video of the Press Conference on October 18, 2024, saved under the filename "October 18, 2024" in the flash drive attached as Annex "F9".

happened to the Marcos family in 1986.⁷⁶ On June 19, 2024, respondent, without offering any reason, resigned as DepEd Secretary.⁷⁷ This was followed by respondent's refusal to attend the State of the Nation Address on July 11, 2024 and her public self-declaration as the designated survivor.⁷⁸ In her November 23, 2024 press conference, respondent stated: "this country is going to hell because we are led by a person who doesn't know how to be a president and who is a liar."⁷⁹ Finally, during a speech on April 12, 2026, respondent's brother announced that they only needed one head, the head of President Marcos.⁸⁰ This is in addition to respondent's acts of attending and joining rallies whose intended purposes are against, and question the legitimacy of, President Marcos.⁸¹

Respondent's pattern of public utterances and conduct, punctuated by a repeated use of violent language and intimidating demeanor, tend to undermine the safety of the President, as well as the peace and order of the country, and cause the destabilization of the government she has sworn to protect and serve. Respondent's statements advocate the removal of the Head of the Executive and the Commander in Chief of the Armed Forces⁸² through illegal means, in direct contravention of the Constitution⁸³ and falling squarely within the ambit of the crime of inciting to sedition, punishable under Article 142 of the Revised Penal Code.

Under the Revised Penal Code, inciting to sedition is "committed by any person who, without taking any direct part in the crime of sedition, should incite others to the accomplishment of any of the acts which constitute sedition, by means of speeches, proclamations, ... disturb the peace of the community, the safety and order of the Government ..."

As the second highest elected official of the Republic, and, therefore, the constitutional successor to the President, respondent openly stated that she wanted the head of the President and that the country has an incompetent leader. Through her utterances and acts, it is undeniable that

⁷⁶ Video of the speech of Sebastian Duterte on January 28, 2024, saved under the filename "January 28, 2024" in the flash drive attached Annex "F9".

⁷⁷ Video of respondent's resignation as Secretary of the Department of Education on June 19, 2024, saved under the filename "Resignation" in the flash drive attached as Annex "F9".

⁷⁸ Video of respondent declaring herself as the "designated survivor" on July 11, 2024, saved under the filename "Designated Survivor" in the flash drive attached as Annex "F9".

⁷⁹ Video of respondent's media briefing on November 23, 2024, saved under the filename "November 23, 2024" in the flash drive attached as Annex "F9".

⁸⁰ Video of the speech of Sebastian Duterte on April 12, 2026, saved under the filename "April 12, 2026" in the flash drive attached as Annex "F9".

⁸¹ Vigil Prayer Rally for Peace and Justice: Hakbang ng Maisug, USA and SDS NY Unite for Human Rights in the Philippines, June 25, 2024, <https://smnnewschannel.com/vigil-prayer-rally-for-peace-and-justice-hakbang-ng-maisug-usa-and-sds-ny-unite-for-human-rights-in-the-philippines/>; Respondent Vice President Duterte makes surprise appearance at 7th day of "Laban Kasama ang Bayan" Prayer Rally, March 13, 2024, <https://smnnewschannel.com/vp-duterte-makes-surprise-appearance-at-7th-day-of-laban-kasama-ang-bayan-prayer-rally/>

⁸² PHIL. CONST., art. VII, § 18.

⁸³ Article XI, 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.

respondent intends to lead or rally the people against lawful authorities, and to disturb the peace of the community, as well as the safety and order of the government—all in direct contravention of the Constitution which she swore to uphold and protect. These are also consistent with the “extraordinary measures” mentioned in the *Supplemental Affidavit* of Mr. Madriaga, which include assassination, civil disobedience, and armed assault at Malacañan Palace to ensure respondent’s assumption of power before 2028.⁸⁴

Respondent’s acts—which destabilize and sow unrest in the government, challenge the authority of the President, promote the blatant disregard for orderly governance, and incite sedition and utter disrespect for public authority—betray the very fabric of democracy. These acts make it glaringly apparent that respondent is utterly unfit to hold public office, much less the second highest position in government. In fact, respondent conducts herself in a way that incites disorder and chaos to the organized government of the Republic of the Philippines.

These same acts also constitute betrayal of public trust. In *Gonzales III v. Office of the President*,⁸⁵ the Supreme Court explained that betrayal of public trust contemplates acts which may be less than criminal, but must be attended by bad faith and of such gravity and seriousness as the other grounds for impeachment.⁸⁶ In this regard, respondent’s acts are tantamount to culpable violation of the Constitution, betrayal of public trust, and other high crimes.⁸⁷

As should be clear from the above, respondent has, through a sustained pattern of public declarations, official acts, and corroborated evidence, gravely transgressed the bounds of her constitutional office. She is shown to have engaged in conduct that not only violates specific provisions of law, but also strikes at the very foundations of constitutional order—public accountability and the rule of law.

The explicit threats against the life of the President and other high officials, her conduct that undermines and threatens democratic stability, combined with the misuse of confidential funds, acts of bribery and corruption of public officials, and SALN Law violations, collectively demonstrate a consistent disregard for the duties of her office and the oath she swore to uphold.

Taken as a whole, these acts do not stand as isolated lapses, but as interconnected manifestations of a pattern of behavior that erodes public trust and endangers democratic stability. The Office of the Vice President, as the second highest office of the Republic, demands the highest degree of

⁸⁴ *Supplemental Affidavit* of Ramil Madriaga dated April 11, 2026, refer to Annex “W4”.

⁸⁵ G.R. Nos. 196231 & 196232, September 4, 2012.

⁸⁶ *Id.*

⁸⁷ High Crimes refer indictable offenses and are of such enormous gravity that they strike at the very life of the orderly working of government that would render an official unworthy to remain in office, See *Journal of the Constitutional Commission*, Vol. I No. 40 and 41, dated July 26 and 28, 1986.

integrity and restraint. Instead, respondent is shown to have used the authority, platform, and resources of her office in a manner that has generated fear, division, and institutional instability.

The evidence on record establishes more than sufficient probable cause to impeach the Vice President. Accordingly, the Impeachment Prosecutors intend to present additional witnesses, documents and other evidence as may be necessary or relevant to substantiate all the allegations herein, including the bank accounts and records of respondent and her spouse. They likewise reserve the right to request the issuance of subpoenas to compel the attendance of witnesses and the production of documents and other relevant evidence.

PRAYER

WHEREFORE, it is respectfully prayed that after trial, the Senate, sitting as an Impeachment Court, render judgment:

1. **DECLARING** respondent Vice President Sara Z. Duterte **GUILTY** on all the articles of impeachment presented;
2. **IMPOSING** upon respondent Vice President Sara Z. Duterte the penalty of **REMOVAL FROM OFFICE** as Vice President of the Republic of the Philippines and **PERPETUAL DISQUALIFICATION FROM HOLDING ANY OFFICE** under the Republic of the Philippines; and
3. **DECLARING** that respondent Vice President Sara Z. Duterte shall further be **LIABLE TO PROSECUTION, TRIAL, AND PUNISHMENT, ACCORDING TO LAW.**

Other just and equitable reliefs are likewise prayed for.