

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

CLIENT'S COPY

**FERDINAND "BONGBONG" R.
MARCOS, JR.,**

Protestant,

- versus -

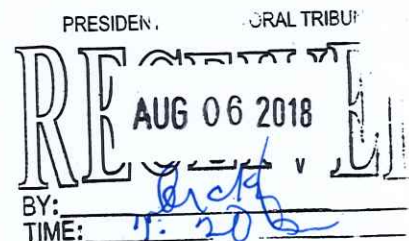
**MARIA LEONOR "LENI DAANG
MATUWID" G. ROBREDO,**

Protestee.

X - - - - - X



PET Case No. 005
For: Election Protest
Vice-President



EXTREMELY URGENT MOTION
TO INHIBIT
ASSOCIATE JUSTICE
ALFREDO BENJAMIN S. CAGUIOA

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.**, by himself, and unto this honorable Presidential Electoral Tribunal ("PET"), most respectfully moves for the immediate inhibition of Associate Justice Alfredo Benjamin S. Caguioa ("**Associate Justice Caguioa**") from participating in any of the proceedings relating to the above-entitled election protest on the ground of evident bias and manifest partiality in favor of the protestee Maria Leonor G. Robredo ("**Robredo**") on the basis of the following:

Canons relating to Judicial Ethics

1. **Administrative Matter (A.M.) No. 03-05-01-SC¹**, otherwise known as the **Adoption of the New Code of Judicial Conduct for the Philippine Judiciary**, mandates that every member of the Philippine Judiciary shall abide, uphold and maintain its canons on Independence, Integrity, Impartiality, Propriety, Equality, Competence and Diligence.

¹ Promulgated on May 15, 2004.

2. **Canon 3 of A.M. No. 03-05-01-SC** emphasizes that **impartiality is essential to the proper discharge of the judicial office**. Hence, it must be applied not only to the decision itself but also to the process by which the decision is made, thus:

CANON 3 **IMPARTIALITY**

Impartiality is essential to the proper discharge of the judicial office. It applies not only to the decision itself but also to the process by which the decision is made.

3. Pursuant thereto, judges, justices and other members of the Philippine Judiciary are decreed to perform their judicial duties **WITHOUT FAVOR, BIAS OR PREJUDICE**. They are also commanded to ensure that their conduct, **both in and out of court**, maintains and **enhances the confidence of the public**, the legal profession and litigants **in the impartiality of the judge and of the judiciary**. Thus:

SEC. 1. Judges shall perform their judicial duties without favor, bias or prejudice.

SEC. 2. Judges shall ensure that his or her conduct, **both in and out of court**, maintains and enhances the confidence of the public, the legal profession and litigants in the impartiality of the judge and of the judiciary.

4. The Old Code of Judicial Conduct echoes the same tenets by enjoining the members of the Philippine Judiciary to:

CANON 1– A judge should uphold the integrity and independence of the judiciary.

Rule 1.01 – A judge should be the embodiment of competence, integrity, and independence.

Rule 1.02 – **A judge should administer justice impartially and without delay.**

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CANON 2 – A judge should avoid impropriety and the appearance of impropriety in all activities.

Rule 2.01 – A judge should so behave at all times as to promote public confidence in the integrity and impartiality of the judiciary.

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Rule 2.03 – **A judge shall not allow family, social, or other relationships to influence judicial conduct or judgment.** The prestige of judicial office shall not be used or lent to advance the private interests of others, nor convey or **permit others** to convey the impression that **they are in a special position to influence the judge.**²

5. Consequently, judges and justices are mandated under **Rule 3.12 of the Old Code of Judicial Conduct and Section 5, Canon 3 of the New Code of Judicial Conduct to disqualify themselves** from participating in any proceedings in which they are unable to decide the matter impartially or **in which it may appear to a reasonable observer that they are unable to decide the matter impartially.** Thus:

SEC. 5. Judges shall disqualify themselves from participating in any proceedings in which they are unable to decide the matter impartially or in which it may appear to a reasonable observer that they are unable to decide the matter impartially. Such proceedings include, but are not limited to, instances where (a) **The judge has actual bias or prejudice concerning a party** or personal knowledge of disputed evidentiary facts concerning the proceedings; (b) The judge previously served as a lawyer or was a material witness in the matter in controversy; (c) The judge, or a member of his or her family, has an economic interest in the outcome of the matter in controversy; (d) The judge served as executor, administrator, guardian, trustee or lawyer in the case or matter in controversy, or a former associate of the judge served as counsel during their association,

² Emphasis supplied.

or the judge or lawyer was a material witness therein; (e) The judge's ruling in a lower court is the subject of review; (f) The judge is related by consanguinity or affinity to a party litigant within the sixth civil degree or to counsel within the fourth civil degree; or (g) **The judge knows that his** or her **spouse** or child **has** a financial interest, as heir, legatee, creditor, fiduciary, or otherwise, in the subject matter in controversy or in a party to the proceeding, or **any other interest that could be substantially affected by the outcome of the proceedings.**³

6. Judges and Justices are likewise enjoined under **Section 1, Canon 4 of A.M. No. 03-05-01-SC** to avoid impropriety and the appearance of impropriety in all of their activities. Moreover, they are forbidden by **Section 4, Canon 4 of A.M. No. 03-05-01-SC** from participating in the determination of a case in which any member of their family is associated in any manner with the case. Thus:

CANON 4 PROPRIETY

Propriety and the appearance of propriety are essential to the performance of all the activities of a judge.

SEC. 1. Judges shall avoid impropriety and the appearance of impropriety in all of their activities.

XXX XXX XXX

SEC. 4. Judges shall not participate in the determination of a case in which any member of their family represents a litigant or is associated in any manner with the case.⁴

³ Emphasis and underscoring supplied.

⁴ Emphasis supplied.

Rationale behind Inhibition

7. In the landmark case of **Pimentel v. Salanga**⁵, Justice Conrado Sanchez stated that "To disqualify or not to disqualify himself x xqwwwwwwwwwwwwwwwwwwqww x, as far as respondent judge is concerned, is a **matter of conscience**". He then laid down what still remains the guiding principle regarding the voluntary inhibition of judges:

"A judge may not be legally prohibited from sitting in a litigation. **But when suggestion is made of record that he might be induced to act in favor of one party** or with bias or prejudice against a litigant arising out of circumstance reasonably capable of inciting such a state of mind, **he should conduct a careful self-examination.** He should exercise his discretion in a way that the people's faith in the courts of justice is not impaired. A salutary norm is that he reflect on the probability that a losing party might nurture at the back of his mind the thought that the judge had **unmeritoriously tilted the scales of justice against him.** That passion on the part of a judge may be generated because of serious charges of misconduct against him by a suitor or his counsel, is not altogether remote. He is a man, subject to the frailties of other men. He should, therefore, exercise great care and caution before making up his mind to act or withdraw from a suit where that party or counsel is involved. He could in good grace inhibit himself where that case could be heard by another judge and where no appreciable prejudice would be occasioned to others involved therein. **On the result of his decisions to sit or not to sit may depend to a great extent the all-important confidence in the impartiality of the judiciary.**"⁶

8. Since then, the Supreme Court has consistently held that members of the judiciary should have a sense of propriety (also known as "*delicadeza*") for the fair, just and impartial administration of justice. As aptly pointed out by Justice Fernando in **Mateo Jr. v. Villaluz**⁷

⁵ Pimentel v. Salanga, 21 SCRA 160 [1967]

⁶ Emphasis supplied.

⁷ Mateo Jr. v Villaluz, 50 SCRA 18 [1973], citing Government v. Abella, 49 Phil. 374; Dais v. Torres, 57 Phil. 897 and People v. Gomez, 20 SCRA 29.

"It is now beyond dispute that due process cannot be satisfied in the absence of that degree of objectivity on the part of a judge sufficient **to reassure litigants of his being fair and being just.** There is the legitimate expectation that the decision arrived at would be the application of the law to the facts as found by **a judge who does not play favorites. For him, the parties stand on equal footing.** In the language of Justice Dizon: 'It has been said, in fact, that due process of law requires a hearing before an impartial and disinterested tribunal, and that every litigant is entitled to nothing less than the cold neutrality of an impartial judge.'"

xxx xxx xxx

"A judge has both the duty of rendering a just decision and the duty of doing it in a manner completely free from suspicion as to its fairness and as to his integrity."⁸

9. In **Gutang v. Court of Appeals**⁹, this Court was emphatic in holding that a judge should **immediately** inhibit himself so as not to cast doubt on the integrity of the judiciary, thus :

"Truly, the presiding judge must maintain and preserve the trust and faith of the parties-litigants. He must hold himself above reproach and suspicion. **At the very first sign of lack of faith and trust in his actions, whether well-grounded or not, the Judge has no other alternative but to inhibit himself from the case.** When circumstances appear that will induce doubt as to his honest actuations and probity in favor of either party, or incite such state of mind, he should conduct a careful self-examination. He should exercise his discretion in a way that the people's faith in the Courts of Justice is not impaired. The better course for the judge under such circumstances is to disqualify himself. That way, **he avoids being misunderstood, [and] his reputation for probity and objectivity is preserved. What is more important [is that]**

⁸ Emphasis supplied.

⁹ Gutang v. Court of Appeals, 292 SCRA 76 [1998]

the ideal of impartial administration of justice is lived up to.”¹⁰

10. Based on the foregoing doctrines and precepts of both the **Old Code** and the **New Code of Judicial Conduct for the Philippine Judiciary**, it is now incumbent upon **Associate Justice Caguioa** to immediately recuse and/or inhibit himself from participating in any of the proceedings relative to the above-entitled election protest.

Basis for inhibition

11. **Associate Justice Caguioa** cannot deny that he is biased towards the “yellow brigade” given his close ties with his friend and former boss, **former President Benigno Simeon “Noynoy” C. Aquino, III (“Noynoy Aquino”)**.

12. It is a matter of public knowledge that **Associate Justice Caguioa** is a **childhood friend** of **Noynoy Aquino**. In fact, they were classmates during grade school, high school and college at the Ateneo de Manila University.

13. During his term as President, **Noynoy Aquino** appointed **Associate Justice Caguiao** as Chief Presidential Legal Counsel from January 2013 to October 2015 (2 years & 10 months); then as Secretary of Justice from October 2015 to January 2016 (4 months) and then ultimately, on February 2016, as the 174th Justice of the Supreme Court.

14. Barely 4 months after **Noynoy Aquino** appointed him as the 174th Justice of the Supreme Court, **Associate Justice Caguiao** became the *ponente* of Marcos’ election protest before the Supreme Court, acting as the Presidential Electoral Tribunal (PET).

15. To say that **Noynoy Aquino** and his family bear a grudge against the undersigned protestant and his family is an understatement.

¹⁰ Emphasis supplied.

16. It is public knowledge that **Noynoy Aquino** had nothing but harsh words to say about protestant Marcos and would verbally criticize him and his family before, during, and even after the May 2016 elections. He practically used his office to convince the voting public not to vote for protestant Marcos as Vice-President.

17. It is also public knowledge that **Noynoy Aquino** handpicked protestee **Robredo** to run against protestant Marcos for the Vice-Presidential position in the May 2016 elections.

18. On June 29, 2016 – barely four (4) months after **Noynoy Aquino** appointed **Associate Justice Caguioa**, the election protest filed by protestant Marcos curiously landed on the latter's lap.

19. Given his fraternal relations with **Noynoy Aquino**, simple *delicadeza* should have prompted **Associate Justice Caguioa** to readily recuse himself from participating in the election protest filed by his former boss' arch nemesis. Regrettably, however, it would appear that **Associate Justice Caguioa** had other plans because he even took on the responsibility of being the *ponente* in the said election protest.

20. Because of his utmost respect for this honorable Court and because he did not want to rock the boat, so to speak, protestant Marcos has been trying to remain calm and collected these last two (2) years. Despite the attendant delays in his election protest, he has tried to stay above the fray.

21. To add insult to injury, however, protestant Marcos recently discovered that **Associate Justice Caguioa's** wife, Pier Angela "Gel" Caguioa ("**Mrs. Caguioa**"), was and still is equally intimate not only with the Aquino family but also with potestee **Robredo**.

22. Screenshots of Viber messages purportedly coming from **Mrs. Caguioa** in her Viber chat group named "AHS77/COLL81 COR" have purportedly been circulating online and have become hot trending topics of netizens all over the country.

23. An article regarding the same was posted on <http://radyo.inquirer.net/131733/questions-need-answers> The said article is attached hereto to "Annex **A**" and made an integral part of this Motion.¹¹

24. The Viber messages reveal that **Mrs. Caguioa** was **and still is an ardent supporter** of protestee **Robredo** and even **actively campaigned** for the latter when she ran against protestant Marcos in the May 2016 elections.¹²

25. **Mrs. Caguioa's** resentment towards protestant Marcos and his family is as clear as night and day. In one of her comments, she wrote : *"(i)f BBM wins and if he wins because of the youth, it'll be [the] failure of our generation. **We were the main catalysts of Edsa 1** and yet we failed to impart its lessons upon the generation that followed us."*¹³

26. The series of Viber messages were posted in the Facebook account of former Baguio City Councilor Tonyboy Tabora on July 13, 2018 at 8:27 in the morning. As of **August 4, 2018**, **"The Conjugal Conspiracy"** video posted by Mr. Tabora in his Facebook page garnered **Eight Thousand Eight Hundred (8,800)** shares and **Three Hundred Twelve Thousand (312,000)** views.¹⁴

Arguments in support of inhibition

27. **Section 4, Canon 4** of **A.M. No. 03-05-01-SC** prohibits a judge or justice from participating in the determination of a case in which any member of their family is associated in any manner with the case.

28. With all due respect, **Mrs. Caguioa's** close association and personal relationship with protestee **Robredo** is embraced in the proscription mandated by **Section 4, Canon 4** of **A.M. No. 03-05-01-SC**.

¹¹ Inquirer article dated August 4, 2018 : <http://radyo.inquirer.net/131733/questions-needanswers>

¹² Ibid.

¹³ Ibid.

¹⁴ <https://www.facebook.com/tonyboy.tabora/videos/1278069985662628>

29. Given the evident bias, manifest partiality and blatant prejudice shown by **Associate Justice Caguioa** and **Mrs. Caguioa** in favor of **Noynoy Aquino** and protestee **Robredo**, the undersigned protestant is left with no other recourse but to file the instant ***Motion for the Inhibition*** pursuant to the mandate of **Canons 3 and 4** of the **New Code of Judicial Conduct for the Philippine Judiciary**.

30. It bears reckoning that in the recent case of ***Celerna Calayag, et al. v. Sulpicio Lines, Inc.***,¹⁵ this honorable Court reminded the members of the Philippine Judiciary that:

"Judges should avoid not just impropriety in their conduct but even **the mere appearance of impropriety**¹⁶ for appearance is an essential manifestation of reality.¹⁷ In insulating the Bench from unwarranted criticism, thus preserving a democratic way of life, **it is essential that judges be above suspicion.**¹⁸ It bears stressing that the duty of judges is not only to administer justice but also **to conduct themselves in a manner that would avoid any suspicion of irregularity.**¹⁹ This arises from the avowed duty of members of the Bench to promote confidence in judicial system. Occupying an exalted position in the administration of justice, judges must pay a high price for the honor bestowed upon them. Hence, **any act which would give the appearance of impropriety becomes, of itself, reprehensible.**²⁰

31. The undersigned protestant has been advised that the mere appearance of impropriety, partiality, bias and prejudice on the part of the judiciary necessarily offends the Constitutional right of the aggrieved party-litigant to due process.

¹⁵ G.R. No. 221864, September 14, 2016.

¹⁶ *San Juan v. Bagalacsa*, 347 Phil. 696, 701 (1997).

¹⁷ *Espiritu v. Jovellanos*, 345 Phil. 823, 835 (1997).

¹⁸ *Concerned Employees of the RTC of Dagupan City v. Falloran-Aliposa*, 384 Phil. 168, 190 (2000).

¹⁹ *Contreras v. Solis*, 329 Phil. 376, 380 (1996).

²⁰ *Supra* note 10, 181.

32. Due process necessarily requires that a hearing be conducted before an impartial and disinterested tribunal because unquestionably, every litigant is entitled to nothing less than the cold neutrality of an impartial judge. **All the other elements of due process, like notice and hearing, would be meaningless if the ultimate decision would come from a partial and biased judge.**²¹

33. In light of the clear and convincing evidence of bias, partiality and prejudice exhibited by **Associate Justice Caguioa** and **Mrs. Caguioa** in favor of protestee **Robredo**, the continued presence and participation of **Associate Justice Caguioa** as the *ponente* of the above-entitled case is a gross violation of the undersigned protestant's Constitutional right to due process of law.

34. Given the fact that the Supreme Court is a collegial body, it would be unfair and unjust for the other members of this esteemed Tribunal to be tainted by the impropriety of **Associate Justice Caguioa**. Consequently, it is imperative that he inhibit himself from participating in the proceedings and deliberations relative to this election protest.

PRAYER

ACCORDINGLY, the undersigned protestant respectfully prays that **Associate Justice Caguioa** immediately **RECUSE** and **INHIBIT** himself from participating in any of the proceedings in connection with the above-entitled election protest.

Other reliefs, just and equitable under the premises, are likewise prayed for.

City of Manila, Philippines, **4 August 2018.**


FERDINAND "BONGBONG" R. MARCOS, JR.
Protestant

²¹ *Ma. Regina S. Peralta v. Judge George E. Omelio, A.M. No. RTJ-11-2259, 22 October 2013.*

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Intramuros, Manila

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EXPLANATION

[Pursuant to Rules 30 and 31 of the
2010 Rules of the Presidential Electoral Tribunal]

Copies of the foregoing ***Extremely Urgent Motion to Inhibit*** were served to the above-mentioned parties by registered mail, personal service being impractical due to distance, time and manpower constraints.



FERDINAND "BONGBONG" R. MARCOS, JR.

AFFIDAVIT OF SERVICE

(Revised as of April 1, 1994)

I, **Jeny V. Ramos**, with office address at 30/F, Tycoon Centre, Pearl Drive, Ortigas Center, Pasig City, after being duly sworn, do hereby depose and say:

That on August 6, 2018, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

“EXTREMELY URGENT MOTION TO INHIBIT ASSOCIATE JUSTICE ALFREDO BENJAMIN S. CAGUIOA”

In PET Case No. 005 entitled **“FERDINAND ‘BONGBONG’ R. MARCOS, JR., Protestant, -versus- MARIA LEONOR ‘LENI DAANG MATUWID’ G. ROBREDO, Protestee”**, pursuant to Sections 3, 4, 5 and 10, Rule 13 of the Rules of Court, as follows:

By Registered Mail:

ATTY. ROMULO B. MACALINTAL
c/o Sardillo Sardillo Salom Law Office
Unit 802, Taipan Place, F. Ortigas Avenue
Ortigas Center, Pasig City

R. R. Nos.

RD 961821110 22

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RD 961821106 22

COMMISSION ON ELECTIONS
Law Department
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Intramuros, Manila

RD 904532450 22

By depositing a copy at the post office in Manila, as evidenced by Registry Receipt(s) No(s) and indicated after the name(s) of the addressee(s), and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered.

August 6, 2018, Manila, Philippines.

WR

JENY V. RAMOS

Affiant


SUBSCRIBED and **SWORN** to before me this AUG 06 2018 2018 at the City of Manila, Philippines. Affiant personally appeared and exhibited to me her **SSS ID with UMID No.: 0033-6355234-4 as proof of her competent identification**, she being the same person herein who executed the foregoing document.

Doc. No. 369
Page No. 24
Book No. 200
Series of 2018.

Atty. Pedro D. Genato
ATTY. PEDRO D. GENATO
Notary Public Until Dec. 31, 2019
Notarial Commission 2018-011 Mla.
IBP# 012432 Pasig 7-27-17 until 2019
PTR# Mla 6993998 - 1-4-2018
Roll# 12088,, TIN# 132-436-687
MCLE Compl. No. V-0005232 until 4-14-19


VERIFIED DECLARATION

I, **JENY V. RAMOS**, with office address at 30/F, Tycoon Centre, Pearl Drive, Ortigas Center, Pasig City, hereby declare that the document/s (and annexes thereof) hereto submitted electronically in accordance with the Efficient use of Paper Rule is/are complete and true copy/ies of the document/s **“EXTREMELY URGENT MOTION TO INHIBIT ASSOCIATE JUSTICE ALFREDO BENJAMIN S. CAGUIOA”** (with Annex “A” & USB) in PET Case No. 005 entitled **FERDINAND ‘BONGBONG’ R. MARCOS, JR., Protestant, -versus- MARIA LEONOR ‘LENI DAANG MATUWID’ G. ROBREDO, Protestee,** filed with the Presidential Electoral Tribunal.

Signature: 
Printed Name: **Jeny V. Ramos**
Position: Staff
Date: August 6, 2018

SUBSCRIBED and ***SWORN*** to before me this **AUG 06 2018** 2018 at the City of Manila, Philippines. Affiant personally appeared and exhibited to me her SSS ID with UMID No.: 0033-6355234-4 as proof of her competent identification, she being the same person herein who executed the foregoing document.

Person Administering Oath


ATTY. PEDRO D. GENATO
Notary Public Until Dec. 31, 2019
Notarial Commission 2018-011 Mla.
IBP# 012432 Pasig 7-27-17 until 2019
PTR# Mla 6993998 - 1-4-2018
Roll# 12088., TIN# 132-436-687
MCLE Compl. No. V-0005232 until 4-14-19

Doc. No. 370 ;
Page No. 74 ;
Book No. 40 ;
Series on 2018.

Column

Questions that need answers

By Len Montaña August 04, 2018 - 05:14 PM SHARE(S): 0



THE CONJUGAL CONSPIRACY

Anyone can find just about anything on social media these days and that includes issues that may be legitimate or not but nonetheless becomes the staple of social media commentaries.

I chanced upon a post on Facebook post of one Tony Tabora.

Out of curiosity I clicked the video.

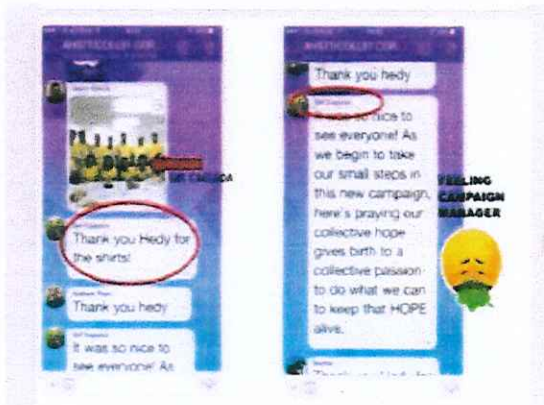
The video raises legitimate questions.

If not questions, at least concerns and suspicions of prejudgment if not outright biases or perceptions of it.

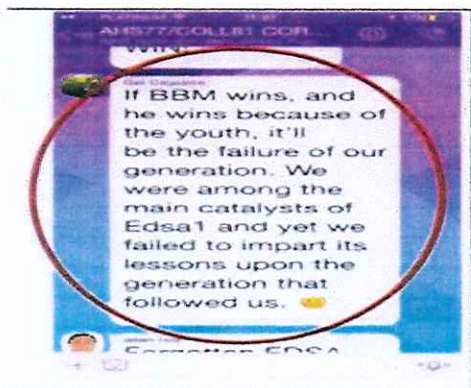
Of course there is always the presumption of regularity and integrity regardless of who appointed Supreme Court Justice Benjamin Caguioa but what if the views of his wife Angela also known as Gel over the Marcoses reflect that of her husband?

What if Gel's comments give a hint on why there is delay in the ruling of the Presidential Electoral Tribunal?

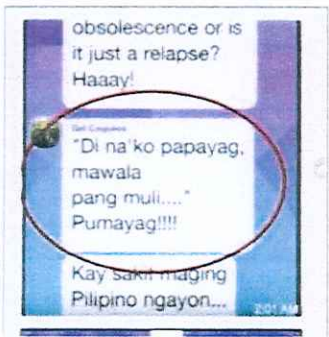
On the series of message exchanges on their private Viber group account named "AHS77/COLL81 COR", Mrs. Gel Caguioa purportedly states that "It was so nice to see everyone! As we begin to take our steps in this new campaign, here's praying our collective hope gives birth to a collective passion to do what we can to keep that hope alive", as shown in this picture.



The exchange of messages in the supposed Viber chat continues as Mrs. Gel Caguioa writes her response, " If BBM wins and he wins because of the youth, it'll be the failure of our generation. We were among the main catalysts of Edsa 1 and yet, we failed to impart its lessons upon the generation that followed us".



At the end of the supposed Viber chat, Mrs. Gel Caguioa also says, " Di na'ko papayag, mawala pang muli..."....Pumayag!!!



The election protest of Marcos has been pending for two years now-a long time to wait for anyone, Marcos or not. Mrs. Caguioa is not part of PET that's for sure but if her views reflect that of her husband is a matter that remains to be seen.

Curious? Intrigued? Here's the link of that Tabora video upload and these are the screenshots of Viber messages purportedly coming from Mrs. Caguioa to her Viber chat group named "AHS77/COLL81 COR"

circulated online and now a hot trending topic.

Here's the link.



USB Containing video presentation entitled
“THE CONJUGAL CONSPIRACY”

