

REPUBLIC OF THE PHILIPPINES
HOUSE OF REPRESENTATIVES
Quezon City

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**COMPLAINT FOR IMPEACHMENT AGAINST PRESIDENT GLORIA
MACAPAGAL - ARROYO**

HON. GLORIA MACAPAGAL-ARROYO
Respondent.

X ----- X

C O M P L A I N T

Complainant, by himself, respectfully states:

NATURE OF COMPLAINT

This is a verified complaint for the impeachment of respondent Hon. Gloria Macapagal-Arroyo, incumbent President of the Republic of the Philippines, upon grounds mentioned below. This complaint is filed pursuant to the provisions of Article XI (Accountability of Public Officers), Sections 2 and 3 of the Philippine Constitution.

THE PARTIES

Complainant is a Filipino citizen, of legal age, and with business address at Unit 1B 2/F Cacho Gonzales Building, 101 Aguirre Street, Legaspi Village, Makati City where he may be served with the processes of this Honorable Body; while Respondent is the incumbent President of the Republic of the Philippines and may be served with summons and other processes of this august body at the Office of the President, Malacanang, Manila.

STATEMENT OF FACTS

1. On June 30, 2004, Respondent took her oath of office as the 14th President of the Republic of the Philippines, stating:

"I do solemnly swear that I will faithfully and conscientiously fulfil my duties as 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. So help me God."

2. Thereafter, or on July 1, 2004, she assumed office and took on the duties and responsibilities as the President of the Republic.

3. During her incumbency as President of the Republic, the Secretary of the Department of Transportation and Communications, Sec. Leandro Mendoza, on April 21, 2007 entered into an agreement with the ZTE for the latter to provide equipments, construct and install the same for the National Broadband Network Project under terms and conditions apparently disadvantageous to the Filipino people.

4. It appears that entering into such contract was actually dictated by the illegal and corrupt machinations undertaken by high government officials, including but not limited to Chairman Benjamin Abalos of the Commission on Elections (COMELEC), House Speaker Jose De Venecia, Jr. and the Speaker's son, Jose De Venecia III. In fact, in an affidavit executed by Jose De Venecia III, he admits that a breakfast meeting was organized by House Speaker Jose De Venecia to allow the two proponents of the National Broadband Network Project, ZTE and AHI, to consolidate their proposals and corner the broadband project.

Attached herewith and made an integral part hereof as Annex "A" is a photocopy of the said affidavit.

5. That these corrupt and illegal negotiations were being undertaken was not unknown to the Respondent. In fact, in his testimony before the Senate, Jose De Venecia III claimed under oath that his father, Speaker Jose De Venecia, told him that the Respondent President Gloria Macapagal-Arroyo, Speaker Jose De Venecia, Jr. and COMELEC Chairman Benjamin Abalos discussed the respective proposals of

AHI and ZTE during a golf game in China.¹

6. Worse, Secretary Romulo Neri, in his September 26, 2007 testimony before the Senate, admitted under oath that he was offered a P200M bribe by COMELEC Chairman Abalos, and that he reported the matter to the Respondent President. Despite being told of the bribe offer, the Respondent did nothing.

GROUND

7. On the basis of the foregoing facts that now form part of the official records of the Senate, there is ground to assert that:

RESPONDENT BETRAYED THE PUBLIC TRUST

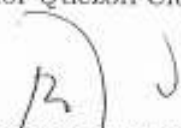
A. The Respondent betrayed the public trust when she connived with COMELEC Chairman Benjamin Abalos and House Speaker Jose De Venecia, Jr. to manipulate the proposals for a national broadband network to pave the way for an overpriced and anomalous contract.

B. The Respondent betrayed the public trust when she had the project implemented by the Department of Transportation and Communications

PRAYER

WHEREFORE, premised considered, it is respectfully prayed that after evaluation, this Complaint be given due course.

October 5, 2007, Makati for Quezon City


ROBERTO RAFAEL J. PULIDO
Unit 1B 2nd Floor
Cacho Gonzales Building, 101 Aguirre Street
Legaspi Village, Makati City

¹ As reported in "Length and breadth of broadband deal", Philippine Daily Inquirer, at page A8, September 27, 2007

VERIFICATION

I, ROBERTO RAFAEL J. PULIDO, of legal age, Filipino, with business address at Unit 1B 2/F Cacho Gonzales Building, 101 Aguirre Street, Legaspi Village, Makati City, after having been sworn to in accordance with law, do hereby depose and state that:

1. I am the complainant in the above-entitled complaint for impeachment;
2. I have prepared the same and all the allegations therein are true of my own knowledge and belief on the basis of my reading and appreciation of documents and records pertinent thereto;


IN WITNESS WHEREOF, I have hereunto placed my hand this 5th Day of October, 2007.


ROBERTO RAFAEL PULIDO

OCT 05 2007

SUBSCRIBED AND SWORN to before me this — day of October, 2007, affiant exhibiting to me his Tax Identification Number 122 509 264.

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DAVID MICHAEL O. GABRIEL
NOTARY PUBLIC
UNTIL DECEMBER 31, 2007
PTR NO. 23486 11-8-07 Makati
Notarial Commission No. 352
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Valero St., Salcedo Village, Makati