

Title: Manalo vs. People of the Philippines

Facts:

Felix Nathaniel “Angel” Villanueva Manalo II, the petitioner, faced various criminal charges after authorities discovered several unlicensed firearms and ammunition in his home within the Iglesia Ni Cristo Compound. Following an initial resolution from the Office of the City Prosecutor of Quezon City, Manalo, along with his companions, faced Information for violation of R.A. No. 10591 (Illegal Possession of Firearms and Ammunitions).

Challenge emerged due to a “no bail recommend” from the OCP which led Manalo to file Reinvestigation and Motion to Fix Bail motions. Following further procedural actions, including motions and amended information filed by the prosecution, led to the RTC’s denial of bail for Manalo and admission of the prosecution’s Amended Information.

Manalo contested the RTC’s Joint Resolution on the grounds of invalidity of the Amended Information, due to lack of proper signing authority by City Prosecutor Donald T. Lee, thus arguing for his right to bail. His Motion for Reconsideration also focused on the procedural missteps, principally revolving around the proper approval of charges against him.

The procedural journey from RTC to CA involved a manifestation of alleged tampering of the original Amended Information and motions for inhibition against involved judges. Subsequent reshuffling of presiding judges led to repeated resets and re-raffling of Manalo’s case, culminating in the CA’s upholding of the RTC’s initial resolutions and orders.

Issues:

1. Whether the CA erred in not finding grave abuse of discretion by the RTC for accepting the validity of the Amended Information charging Manalo with a capital offense.
2. Whether the CA erred in rejecting Manalo’s claim to the right to post bail as there was no grave abuse of discretion from the RTC’s declaration.

Court’s Decision:

The Supreme Court denied Manalo’s petition, affirming the CA’s decision, upholding the RTC’s resolutions on the amended charges and denial of bail. The court held that the Amended Information was valid even if initially lacking the city prosecutor’s approval because amendments are allowable before a plea is entered, per Section 14, Rule 110 of the Rules of Court. The lack of signature was a formal, not substantial defect. Furthermore, Manalo was not entitled to bail as a matter of right, as he faced a capital offense with prescribed penalties from reclusion perpetua to death. Under those charges, bail can only

be granted if evidence of guilt is not strong, which is at the trial court's discretion.

Doctrine:

The case reiterated established doctrines regarding the amendment of criminal informations and the issue of right to bail in capital offense cases. Amendments to criminal informations are permissible at any stage until the accused has entered his plea, and lack of the prosecutor's approval is a formal, not a substantial defect. Additionally, an accused facing charges punishable by reclusion perpetua to death is not entitled to bail as a matter of right, subject to judicial discretion upon evidence evaluation.

Class Notes:

- Amendments of Complaints/Informations: Pre-plea amendments to formal charges against an accused, as provided under Sec. 14, Rule 110 of the Rules of Court, can be made without leave of court and are not substantial so long as done before the accused enters a plea.
- Right to Bail: Accused persons charged with offenses punishable by reclusion perpetua to death do not have the right to bail as a matter of right; bail may be granted only when evidence of guilt is not strong, which is for the trial court to assess (Philippine Rules of Court, Rule 114, Sec. 4 and 5).
- Formal Defects: Lack of approving signature from the prosecutor on the Information is a formal defect, not affecting the jurisdiction of the court over the case or person of the accused (People v. Villa Gomez).
- Bail in Capital Offenses: Even after the amendment of charges, the reclassification or enhancement of prescribed penalties in capital offenses does not permit bail as a matter of right.

Historical Background:

The case is rooted in the tension that exists between the powers and responsibilities of prosecutors regarding the approval of criminal charges and the rights of accused persons to bail. The decisions and evolving jurisprudence reflect a balance between procedural formalities in criminal cases and the constitutionally guaranteed rights of defendants within the Philippine legal framework.