

Title:

Marilyn Geduspan and Dra. Evangelyn Farahmand vs. People of the Philippines and Sandiganbayan

Facts:

The case began when an information (Criminal Case No. 27525) was filed against Marilyn C. Geduspan and Dr. Evangeline C. Farahmand on July 11, 2002, for violating Section 3(e) of RA 3019 (Anti-Graft and Corrupt Practices Act). The accusation was that as Philhealth Regional Manager/Director (Region VI) and Chairman of the Board of Tiong Bi Medical Center, respectively, they released payment claims to Tiong Bi Medical Center that should have been due to West Negros College, Inc., thereby causing undue injury to the latter.

Geduspan and Farahmand filed a joint motion to quash, arguing the Sandiganbayan lacked jurisdiction over Geduspan's position (classified as Salary Grade 26 and not 27 or higher as required). After the Sandiganbayan denied this motion and the subsequent motion for reconsideration, Geduspan appealed to the Supreme Court through a petition for certiorari under Rule 65, seeking to annul the Sandiganbayan's resolutions.

Issues:

1. Whether the Sandiganbayan has jurisdiction over Marilyn Geduspan, considering her position and salary grade in Philhealth.
2. The interpretation of RA 8249 in relation to the jurisdiction of the Sandiganbayan over officials of government-owned or controlled corporations.

Court's Decision:

The Supreme Court dismissed the petition, emphasizing that jurisdiction of the Sandiganbayan is determined by the position held and not merely the salary grade. The Court clarified that while sections of RA 8249 specify salary grade 27 and higher for certain officials, it includes other positions like heads of government-owned or controlled corporations regardless of their salary grade. Geduspan's position as a Department Manager in Philhealth falls within these provisions, making her subject to the Sandiganbayan's jurisdiction. Moreover, the offense was related to her official duties, further establishing the Sandiganbayan's jurisdiction over the case.

Doctrine:

The jurisdiction of the Sandiganbayan extends to officials of the executive branch occupying positions of regional director and higher or equivalent, including presidents, directors, or

managers of government-owned and controlled corporations, regardless of salary grade, for offenses committed in relation to their office.

Class Notes:

- Jurisdiction of Sandiganbayan includes officials in key positions, regardless of their salary grade, in cases involving violations related to office duties.
- RA 8249 outlines the jurisdiction scope, explicitly including government-owned or controlled corporation executives for related offenses.
- The classification of positions for jurisdiction purposes is based on the nature and responsibilities of the position, not just the salary grade.
- RA 3019 (Anti-Graft and Corrupt Practices Act) aims to prevent corrupt practices among public officers, holding them accountable for actions causing harm or unfair advantage.

Historical Background:

This case underscores the legal intricacies in determining the jurisdiction of the Sandiganbayan, a special court established to try corruption cases involving public officials. It reflects the broader context of efforts within the Philippine legal system to combat corruption and promote accountability. The nuances of law, such as the classification of positions and salary grades, play critical roles in ensuring that officials at all levels are subject to appropriate legal oversight.