

### Title: Uyboco vs. People of the Philippines

### Facts:

In the case of **EDELBERT C. UYBOCO vs. PEOPLE OF THE PHILIPPINES**, Edelbert C. Uyboco (petitioner) sought to reverse the Sandiganbayan's decision dated January 9, 2014, and its Resolution dated March 14, 2014. These court documents declared the petitioner and his co-accused, Rodolfo G. Valencia and Carlo A. Maramot, guilty beyond reasonable doubt of violating Section 3(e) of Republic Act No. 3019, otherwise known as the Anti-Graft and Corrupt Practices Act, in Criminal Case No. 24461.

Uyboco contended that the Sandiganbayan erred in establishing a conspiracy and convicting him without substantial proof of such conspiracy. Moreover, he challenged the denial of his Motion to Reconsider the court's decision, claiming his constitutional rights to due process and competent legal counsel were compromised by his former lawyer's negligence. This negligence was manifested by the lawyer's absence during key trial dates, failure to present any defense evidence, and reliance on defenses provided by co-accused's lawyers, which were not tailored to Uyboco's case.

The case escalated to the Supreme Court after Uyboco filed a Petition for Review on Certiorari, arguing for his motion's merit and for a reopening of the case due to the grave injustice supposedly caused by his former counsel. The Office of the Special Prosecutor opposed this, citing the principle that a client is bound by their counsel's actions, barring noticeable exceptions.

### Issues:

1. Whether the Sandiganbayan erred in finding a conspiracy involving Uyboco and consequently convicting him.
2. Whether Uyboco was deprived of his constitutional rights to due process and competent counsel, warranting the reopening of the case.

### Court's Decision:

The Supreme Court denied Uyboco's petition, thereby affirming the Sandiganbayan's decision and resolution. The Court underscored the distinction between questions of law and fact, justifying that Uyboco's petition, which predominantly raised questions of fact, falls outside the ambit of review under Rule 45 of the Rules of Court. Moreover, the Supreme Court found no substantial deviation from established legal principles that would

compel a different assessment of the evidence presented during the trial.

On the issue of conspiracy, the Court concurred with the Sandiganbayan's finding that Uyboco and Valencia were in conspiracy, based on documented evidence which Uyboco failed to refute satisfactorily. Uyboco's claims of deprivation of due process were also dismissed, highlighting that a client bears the consequences of their counsel's actions except under certain exceptional circumstances, which were deemed inapplicable in this case.

### ### Doctrine:

1. The principle that a client is bound by the acts and negligence of their counsel except in cases of gross negligence that results in the outright deprivation of the client's liberty or property or where justice severely demands otherwise.
2. For a conviction under Section 3(e) of R.A. 3019, it must be established that the accused, as a public officer, acted with manifest partiality, evident bad faith or gross inexcusable negligence, and caused undue injury to any party, including the government, or gave unwarranted benefits to a private party.

### ### Class Notes:

- **Rule on Review on Certiorari**: A Petition for Review on Certiorari should raise only questions of law, distinctly set forth.
- **Client-Counsel Relationship**: A client is bound by their counsel's actions, including procedural mistakes, under normal circumstances. Exceptions include situations of gross negligence by the counsel that deprives the client of due process.
- **Conviction under R.A. 3019, Section 3(e)**:
  - The accused must be a public officer performing administrative, judicial, or official functions.
  - They must demonstrate manifest partiality, evident bad faith, or gross inexcusable negligence.
  - Their actions led to undue injury to any party, including the government, or provided unwarranted benefits to a private party.

### ### Historical Background:

This case emphasizes the judiciary's position on the requisite level of competence expected

from legal counsel and highlights the challenges faced when a petitioner contends an infringement of constitutional rights based on alleged legal representation inadequacies. It also underscores the judiciary's stern approach in addressing graft and corruption charges under the Anti-Graft and Corrupt Practices Act, reaffirming the law's desire to maintain integrity and accountability within public service.