

****Claudio J. Teehankee, Jr. vs. Hon. Job B. Madayag and People of the Philippines****

****Facts:****

The case revolves around the charges against Claudio J. Teehankee, Jr., initially for frustrated murder following the shooting of Maureen Navarro Hultman on July 13, 1991. The original information, filed on July 19, 1991, in Makati City, specified that the attack resulted in gunshot wounds which, if not for timely medical intervention, would have been fatal. Subsequently, Hultman succumbed to her injuries, prompting the private prosecutor to file on October 31, 1991, an omnibus motion for leave of court to admit an amended information charging Teehankee with murder. Teehankee opposed the amendment and subsequent arraignment, contending the lack of a preliminary investigation for the new charge and other procedural concerns. His refusal to be arraigned led to his arraignment by the court's order and the appointment of a counsel de officio to represent him.

****Procedural Posture:****

Teehankee's challenge to the trial court's decisions resulted in this special civil action before the Supreme Court (SC), seeking to nullify the admission of the amended information, the arraignment and plea entered, the appointment of a counsel de officio, and to compel a preliminary investigation of the amended charge. The SC opted to proceed without the Solicitor General's comment to expedite the case in fairness to Teehankee.

****Issues:****

1. Legality and validity of admitting an amended information involving a substantial amendment without a preliminary investigation after the prosecution has rested.
2. Appointment of a counsel de officio for an accused represented by chosen counsel who refuses to participate due to perceived denial of due process.
3. The legal and valid basis for rushing and preferentially scheduling a particular criminal trial over older cases.

****Court's Decision:****

The SC dismissed Teehankee's petition, finding no merit in his arguments:

1. ****Amended Information****: The SC elucidated that, according to the 1985 Rules on Criminal Procedure, an information can be amended at any stage before the accused pleads. Post-plea, only formal amendments are allowed. Since the offense in the amended information (murder) includes the offense in the original one (frustrated murder), it was considered a form of amendment and not substitution. Thus, no preliminary investigation or new plea was necessary.

2. **Counsel de Oficio**: Teehankee's refusal to participate in the proceedings due to a perceived legal issue was found baseless, and the trial court's appointment of counsel de oficio was deemed within discretion aimed at preventing undue delay.
3. **Trial Scheduling**: The SC underscored the trial court's discretion in scheduling cases, provided it does not prejudice the accused's or others' substantial rights.

Doctrine:

- An amended information that does not change the nature of the original charge but rather provides additional detail or alters the stage of execution of the crime can be admitted without necessitating a new preliminary investigation or plea.
- The trial court has broad discretion in the management of cases, including the appointment of counsel de oficio and scheduling of hearings, to ensure the efficient administration of justice.

Class Notes:

- **Amendment vs. Substitution**: Understand the distinction; amendment can occur any time before the accused pleads, while substitution implies a substantial change, warranting a new preliminary investigation and plea.
- **Rights of the Accused**: The procedural safeguards intended to prevent hasty, unjust prosecutions, including the right to due process and protection from trial without adequate investigation.
- **Trial Court Discretion**: Acknowledge the balance between procedural rights and the court's authority in case management, including appointments and scheduling.

Historical Background:

This case is set against the backdrop of the Philippine judicial system's efforts to balance the accused's rights with the imperative of judicial efficiency. It underscores the challenges in procedural and substantive law application, especially in cases of public interest and the evolution of judicial discretion in managing caseloads while safeguarding defendants' rights.