

Title: People of the Philippines vs. Amado “Jake” P. Macasaet, Enrique P. Romualdez, and Joy P. Delos Reyes (Deceased)

Facts:

The consolidated cases revolve around two separate Informations for libel filed against Amado “Jake” Macasaet (Macasaet), Enrique P. Romualdez (Romualdez), and Joy P. Delos Reyes (Delos Reyes) following complaints filed by then-Governor Casimiro “Ito” M. Ynares, Jr. (Ynares), and Atty. Narciso “Jun” Y. Santiago, Jr. (Santiago), due to articles published in the newspapers Malaya and Abante. The complaints were based on articles written by Macasaet deemed defamatory towards Ynares and Santiago. One of Santiago’s complaints was filed in Pasig City while Ynares filed his complaint in Rizal. The Rizal Provincial Prosecutor eventually dismissed these complaints for lack of jurisdiction, suggesting they be filed in Manila or Quezon City. Following a review by the DOJ, probable cause for libel was found against Macasaet, Romualdez, and Delos Reyes for two articles, leading to the filing of Informations in the Regional Trial Court (RTC) of Manila.

The progression of these cases through various legal challenges, including questions of proper venue, allegations of delay violating the right to a speedy trial, and jurisdictional arguments, led to mixed decisions by the RTC of Manila and subsequently by the Court of Appeals (CA).

The Supreme Court (SC) consolidated three petitions for review on certiorari: questioning 1) whether the CA erred in dismissing the libel Information against the accused due to improper venue, and 2) whether the right to speedy disposition was violated.

Issues:

1. Whether the Information for the libel cases was sufficient in form and substance.
2. Whether the cases filed against Macasaet and Romualdez should be dismissed because their right to a speedy disposition of the cases has been violated.

Court’s Decision:

1. On the issue of sufficiency of Information, the SC disagreed with the CA, holding that the Information was sufficient as it clearly indicated that the libelous articles were written and published in Malaya with an address at Port Area, Manila, which sufficiently indicated the venue.
2. On the issue of the right to speedy disposition, the SC found that there was an unreasonable delay from the filing of the complaint to the resolution by the Rizal Provincial

Prosecutor and subsequently by the DOJ. The SC held this delay to be vexatious, capricious, and oppressive, concluding that such inordinate delay violated the accused's right to speedy disposition.

Doctrine:

1. The sufficiency of an Information for libel must clearly indicate the venue as the place where the libel was printed and first published or where the offended party actually resided.
2. An unreasonable delay in the disposition of cases, even at the preliminary investigation stage, violates the right to speedy disposition guaranteed by the Constitution.

Class Notes:

- The essential elements for filing a libel case include a clear statement of the venue where the libel was printed and first published or where the offended party actually resided at the time of the commission of the offense.
- The right to a speedy disposition is a flexible concept, balanced against the societal interests and the rights of the accused. Violation of this right must be assessed based on the length of delay, the reason for the delay, the defendant's assertion of their right, and the prejudice to the defendant.
- Waiver of the right to a speedy trial or disposition must be expressed or implied from the conduct of the accused indicating a relinquishment of the right.

Historical Background:

This case illustrates the complexities and challenges associated with libel litigation in the Philippines, especially regarding the determination of proper venue and the right to a speedy disposition of cases. It reflects on the Philippine legal system's efforts to balance free expression with the protection of individual reputation, within the framework of ensuring timely and fair judicial proceedings.