

Title: Omar Villarba vs. Court of Appeals and People of the Philippines

Facts:

- **Overview:** Omar Villarba was convicted under the Anti-Hazing Act of 1995 for participating in initiation rites that resulted in liver damage to Wilson Dordas III. The case navigated through the Philippine justice system, raising issues about formal amendments to the Information and the sufficiency of allegations thereof.
- **Initiation of Legal Proceedings:** The events transpired around September 15, 2001, in Iloilo City, where members of the Junior Order of Kalantiao, including Villarba, allegedly subjected Dordas to hazing. The original Information charged them under the Anti-Hazing Act.
- **Trial Court Proceedings:** All accused pleaded not guilty to the original Information. The Information was formally amended to correct Dordas's name. Proceedings continued without any arraignment on the amended Information. Dordas testified about his recruitment and the subsequent hazing ordeal. Villarba admitted to being a member but denied inflicting harm. The trial court found Villarba guilty.
- **Court of Appeals:** Villarba appealed, arguing issues about the Information's validity and his non-arraignment on the amended Information. The Court of Appeals upheld Villarba's conviction, emphasizing that the amendment was merely formal and did not prejudice his defense.

Issues:

1. Whether the amendment to the Information is substantial.
2. The sufficiency of the Information regarding the details of the hazing act.
3. Whether the prosecution successfully proved Villarba's guilt beyond reasonable doubt.

Court's Decision:

- The Supreme Court held the amendment (adding 'III' to Dordas's name) as formal, not requiring a re-arraignment. It ruled the Information's language sufficiently informed Villarba of the charges against him, satisfying his constitutional rights.
- On every issue, the Court sided with the lower courts, affirming that the Amendment did not prejudice Villarba's defense, the Information was sufficient to inform him of the charges, and his conviction was supported by credible and detailed testimony from Dordas.

Doctrine:

- **Formal Amendment:** An amendment is considered formal if it does not alter the essence of the charge, affect the theory of prosecution, or prejudice the accused's rights,

thereby not necessitating a re-arraignment.

- **Sufficiency of Information:** The Information need not replicate the statutory language, but must describe the offense in ordinary and concise terms to inform the defendant adequately.

Class Notes:

- **Elements of Hazing under the Anti-Hazing Act:** Membership recruitment involving forced physical or psychological suffering leading to injury.

- **Formal vs. Substantial Amendments:** Distinguishing whether an amendment affects the accused's ability to prepare a defense or changes the nature of the accusation.

- **Right to Be Informed:** Ensures the defendant knows the charge and can mount a defense, linked to the fundamental right to due process.

Historical Background:

- This case reflects ongoing concerns about fraternity-related violence in the Philippines, underscored by the Anti-Hazing Law (RA 8049) aftermath. It highlights the judicial scrutiny on procedural compliance and the sufficiency of charging documents in criminal prosecutions, particularly in cases involving violence in educational settings.