

Title:

****Manipon Jr. vs. Sandiganbayan: A Case of Direct Bribery****

Facts:

Nathaniel S. Manipon Jr., a deputy sheriff of the Court of First Instance of Baguio City, was tasked to enforce an order from the Minister of Labor mandating him to execute a labor arbiter's decision, which required Harry Dominguez, a building contractor and mayor, to pay a sum to Longog Tabek and others. Upon this directive, on November 9, 1979, Manipon initiated a garnishment of Dominguez's bank accounts but did not exert effort to satisfy the judgment promptly.

Dominguez, seeking to lift the garnishment, was led to believe by Manipon that for a consideration, the withdrawal of the garnished amount could be facilitated. An entrapment plan with marked money was set by Dominguez in collaboration with security authorities. On December 28, 1979, upon executing a transaction that lifted the garnishment, Dominguez paid Manipon P1,000.00 with marked bills, which were then identified in Manipon's possession through an immediate operation conducted by security personnel. This led to Manipon's arrest and the seizure of the marked money.

Charged initially under Presidential Decree No. 46, Manipon's charge was later amended to direct bribery under the Revised Penal Code. Throughout the legal proceedings, Manipon pleaded not guilty and contested the charges, leading to his conviction by the Sandiganbayan, thereby appealing to the Supreme Court.

Issues:

1. Whether the Sandiganbayan erred in convicting Manipon of direct bribery.
2. Whether the evidence (P1,000.00 marked money) was inadmissible due to being illegally obtained.

Court's Decision:

The Supreme Court affirmed the Sandiganbayan's decision, finding Manipon guilty of direct bribery. The decision meticulously addressed the elements of direct bribery, establishing that Manipon, a public officer, did indeed accept an offer in exchange for performing an act related to his official duties. The Court dismissed Manipon's defenses as incredible, including his claim of a novation agreement and the illegality of the evidence seizure.

The Court highlighted the exceptions to the requirement of a search warrant, deeming the seizure of the marked money as a lawful search incident to a lawful arrest. This negated

Manipon's argument about the illegality of the money's seizure and its inadmissibility as evidence. Thus, Manipon's appeal was denied for lack of merit.

Doctrine:

The Supreme Court reiterated the elements of direct bribery under Article 210 of the Revised Penal Code and the exceptions to the requirement of a search warrant, specifically the rule allowing search and seizure incidental to a lawful arrest.

Class Notes:

- **Direct Bribery:** Requires a public officer to receive a gift or promise in consideration of performing an act related to their official duties.
- **Legal Search and Seizure Exceptions:** Includes search incidental to an arrest, search of a moving vehicle, and seizure of evidence in plain view, allowing for certain evidences to be admissible even without a warrant.
- **Evidence Admissibility:** Illegally obtained evidence may still be admissible under exceptions to the search warrant requirement, critical for understanding procedural dynamics in criminal law.

Historical Background:

This case reflects the Philippine judiciary's stance on corruption within public officials, emphasizing the gravity of bribery and the importance of integrity in public service. It further delineates the parameters for lawful search and seizures, particularly in scenarios involving entrapment operations against bribery.