

Title: Galman vs. Sandiganbayan: Reopening the Aquino-Galman Double Murder Case

Facts:

The case originates from the assassination of former Senator Benigno “Ninoy” Aquino Jr., a leading opposition figure against President Ferdinand Marcos’ regime, upon his return from exile in the United States on August 21, 1983. The assassination occurred at the Manila International Airport (now Ninoy Aquino International Airport), where Aquino was shot in the head while under military escort. Immediately following the shooting, Rolando Galman, purportedly the gunman, was killed by security forces, who claimed Galman was a communist hitman assigned to assassinate Aquino.

This high-profile assassination resulted in the constitution of a Fact-Finding Board (the Agrava Commission) by President Marcos, which eventually led to the indictment of several military personnel and the commencement of trial in the Sandiganbayan, a special court in the Philippines. However, amidst national and international outcry for justice, allegations of a manipulated and biased trial process emerged, implicating even President Marcos in interfering in the judicial proceedings to ensure the acquittal of the accused.

Petitioners, consisting of a diverse group including the mother and son of Rolando Galman, former justices, university presidents, notable lawyers, and respected members of the community, filed a petition with the Philippine Supreme Court challenging the fairness and integrity of the trial conducted by the Sandiganbayan and the role of the Tanodbayan (Ombudsman) in the prosecution of the case. They asserted that the proceedings were marred with irregularities, ultimately leading to a miscarriage of justice and a violation of due process. Specifically, they requested a retrial before an impartial tribunal, alleging a mock trial that resulted in a predetermined judgment of acquittal.

Issues:

1. Whether there was due process in the trial conducted by the Sandiganbayan and the prosecution led by the Tanodbayan.
2. Whether the trial was manipulated or influenced by external pressures, specifically by then-President Ferdinand Marcos, resulting in a prejudiced trial.
3. The applicability of double jeopardy in the event of ordering a retrial.

Court’s Decision:

The Supreme Court found substantial evidence supporting the petitioners’ claims of a compromised judicial process, including undisclosed secret meetings between President

Marcos and key judicial figures that indicated a predetermined outcome of acquittal. The Court concluded that the trial was indeed a sham, orchestrated from the outset to ensure the exoneration of all accused military personnel. Consequently, the Supreme Court granted the petitioners' motion for reconsideration, set aside the Sandiganbayan's judgment of acquittal, nullified the proceedings, and ordered a retrial, emphasizing the need for a fair, impartial, and unbiased trial.

Doctrine:

The case reiterates the principle that due process must be observed in all judicial proceedings, ensuring fairness, impartiality, and integrity in the administration of justice. It also highlights the exceptional circumstances under which a court's decision, particularly an acquittal, can be voided ab initio for violation of constitutional rights, particularly due process.

Class Notes:

- Due Process of Law: The fundamental right to a fair and impartial trial.
- Double Jeopardy: Protects against trial for the same offense after acquittal or conviction. However, it does not apply to cases where the judgment of acquittal was voided due to the denial of the defendant's or the prosecution's right to due process.
- Void ab initio: A legal declaration that a judicial decision is invalid from the outset due to procedural irregularities or violations of fundamental rights.

Historical Background:

The assassination of Ninoy Aquino and the subsequent trial of his alleged murderers occurred in the context of martial law in the Philippines, a period marked by significant political repression and human rights violations. The manipulation of the trial reflected broader issues of governance, judicial independence, and the struggle for democracy during the Marcos regime.