

Title: Juan Ponce Enrile vs. Sandiganbayan (Third Division) and People of the Philippines

Facts:

On June 5, 2014, Juan Ponce Enrile, a sitting Senator of the Republic of the Philippines, was formally charged with Plunder (punishable by reclusion perpetua to death under Republic Act No. 7080) before the Sandiganbayan (Third Division). Following the charge, Enrile filed an Omnibus Motion seeking to post bail, which was denied on grounds of prematurity. Subsequently, a warrant for his arrest was issued and subsequently served, leading Enrile to surrender to the authorities on the same day the warrant was issued. While in custody, Enrile filed a Motion to Fix Bail on July 7, 2014, arguing that his advanced age and voluntary surrender were mitigating factors that should be considered in his favor. Parallely, he filed a Motion for Detention at the PNP General Hospital, citing his frail health condition. The Sandiganbayan granted his motion for hospital detention but denied the Motion to Fix Bail without conducting a bail hearing to assess the strength of the evidence against him. Enrile's motions and subsequent appeals concentrated on his age, health condition, and non-flight risk status rather than on the evidence of guilt, leading to his Petition for Certiorari to the Supreme Court claiming the Sandiganbayan's refusal violated his right to bail.

Issues:

1. Whether the Sandiganbayan's denial of Enrile's motion for bail, without a hearing to determine the strength of evidence against him, violated his constitutional rights.
2. Whether Enrile's frail health condition constituted an exceptional circumstance warranting his provisional release on bail despite the charge of a non-bailable offense.
3. Whether the Supreme Court can grant bail on humanitarian grounds for an accused charged with a crime punishable by reclusion perpetua.

Court's Decision:

The Supreme Court, in an unprecedented decision, granted Enrile's Petition for Certiorari, setting aside the Sandiganbayan's Resolutions and ordering Enrile's provisional release upon posting a cash bond of P1,000,000.00. The court justified its decision on humanitarian considerations, highlighting Enrile's advanced age and frail health. It ruled that these factors, along with his status and reputation, minimized the flight risk. The Court further noted that the procedure to grant bail did not disregard Enrile's right to due process, as his health conditions were thoroughly discussed and documented throughout the proceedings.

Doctrine:

The Supreme Court established the doctrine that in cases involving elderly accused or those with critical health conditions charged with a crime punishable by reclusion perpetua or death, humanitarian considerations could warrant provisional release on bail, assuming the accused poses no significant flight risk. This decision emphasized evaluating bail applications beyond the textual confines of the law and integrating factors such as age, health condition, and the ability to participate in the proceedings.

Class Notes:

1. **Bail Procedure:** The procedure and conditions for granting bail are outlined under Rule 114 of the Rules of Court. Bail may be a matter of right or discretion, depending on the nature of the offense and the stage of the criminal proceeding.
2. **Exception to Bail:** Under the 1987 Philippine Constitution, Article III, Section 13, all persons shall have the right to bail except those charged with offenses punishable by reclusion perpetua or life imprisonment when evidence of guilt is strong.
3. **Humanitarian Consideration:** Exceptionally, the Supreme Court has recognized humanitarian considerations such as advanced age and significant health issues as grounds for granting bail, even for non-bailable offenses, provided the flight risk is negligible.
4. **“Evidence of Guilt is Strong”:** This standard is crucial in determining eligibility for bail in crimes punishable by reclusion perpetua or higher. The determination must be made during a bail hearing.

Historical Background:

The grant of bail to Senator Juan Ponce Enrile on humanitarian grounds despite being charged with Plunder, a non-bailable offense, has been viewed as a landmark case that expanded the interpretation of the law on bail. This case underscores the Supreme Court’s discretionary power in exceptional circumstances and highlights the balance between the accused’s rights and the interests of justice. Controversially, it opened discussions on equal protection and whether similar considerations would uniformly apply to less influential individuals with similar health conditions and advanced age.