Title: Floro T. Tadena vs. People of the Philippines: A Case of Falsification of Public Document by a Municipal Mayor

Facts:
Floro T. Tadena, the Municipal Mayor of Sto. Domingo, Ilocos Sur, sought the creation of a Municipal Administrator position, leading to the drafting of two versions of a municipal ordinance. The First Version conditioned the creation on satisfying the proposed needs of all municipal offices and implementing a salary increase. Tadena vetoed this, seeking the deletion of these conditions. A Second Version was subsequently approved by the Sangguniang Bayan, revising the condition to merely implementing a 2% salary increase. Upon receiving this version, Tadena altered it to ensure the position's creation and returned it, causing controversy and leading to an enacted Final Version by the Sangguniang Bayan. Secretary Tagorda of the Sangguniang Bayan filed a complaint against Tadena leading to a trial where Tadena was convicted of falsification of a public document. Tadena's appeal focused on procedural and decisional aspects, claiming his actions were within legislative processes and done in good faith.

Issues:
1. Whether the Sandiganbayan erred by not dismissing the case for inordinate delay in prosecution.
2. Whether the Sandiganbayan erred by overlooking the complainant's disinterest in the case's prosecution.
3. Whether the Sandiganbayan incorrectly identified the document falsified by Tadena as genuine.
4. Whether Tadena's modifications to the document were authorized as part of the local legislative process.
5. Whether Tadena acted in good faith without criminal intent in making the document alterations.
6. Whether doubts should have been resolved in Tadena's favor, considering the presumption of innocence.
7. Whether the Sandiganbayan overlooked potential mitigating circumstances in Tadena's favor.

Court's Decision:
The Supreme Court denied Tadena's petition, affirming his conviction by the Sandiganbayan. It held that Tadena falsified a public document by altering a genuine municipal ordinance, emphasizing that his actions exceeded the allowable participation of a

local chief executive in the legislative process and contravened established legal procedures. The Court dismissed Tadena's claims of procedural errors, discrepancy in document genuineness, authorized involvement in the legislative process, and good faith actions. Furthermore, it ruled that Tadena's surrender did not qualify as a mitigating circumstance due to its lack of spontaneity.

Doctrine:
The Supreme Court reiterated the elements of falsification by a public officer under Article 171 of the RPC, emphasizing that making unauthorized alterations to a public document that change its meaning constitutes falsification. It clarified the role and limits of a local chief executive's involvement in the legislative process of local government units.

Class Notes:
– Elements of the crime of falsification by a public officer include: being a public officer, taking advantage of this position, and altering a document to change its meaning.
– Unauthorized alterations or intercalations that change the meaning of a genuine document constitute falsification.
– The role of local chief executives in the legislative process is limited to approval or veto; they cannot unilaterally alter legislative documents.
– Good faith is determined by conduct and outward acts, not by self-serving statements of intent.
– Voluntary surrender as a mitigating circumstance requires spontaneity and an absence of inevitable arrest.

Historical Background:
This case underscores the critical integrity required in the legislative processes at the municipal level in the Philippines. It highlights the judiciary's role in maintaining checks and balances on the powers of elected officials, especially in the enactment and modification of local legislative documents. The decision reaffirms the limitations of the powers of municipal mayors within the legislative framework, emphasizing adherence to legal procedures and the potential criminal consequences of overstepping those boundaries.