

Title: Eutiquio A. Peligrino vs. People of the Philippines

Facts:

The case stems from an Information filed on October 17, 1991, by Special Prosecution Officers, alleging that Eutiquio A. Peligrino, an Examiner II at the Bureau of Internal Revenue (BIR), demanded PHP 200,000 from Dr. Antonio N. Feliciano in connection with an alleged deficiency income tax assessment. The amount demanded included a portion supposedly for the BIR and the remainder for Peligrino himself.

On February 25, 1992, an amended Information included Buenaventura V. Buenafe as a co-accused. Both accused pleaded not guilty on August 28, 1992. After a trial, on April 24, 1998, the Sandiganbayan convicted Peligrino but acquitted Buenafe.

The prosecution detailed how a letter of authority for tax examination was delivered to Dr. Feliciano, which led to a demand for PHP 500,000, later negotiated down to PHP 200,000. Suspecting extortion, Dr. Feliciano sought assistance from the NBI, resulting in an entrapment operation on October 15, 1991, during which Peligrino received marked money from Dr. Feliciano. Various witnesses, including NBI agents and a forensic chemist, corroborated the entrapment and the chemical marking found on Peligrino.

The defense primarily contended that the situation was a setup, emphasizing the brief possession of the marked money as evidence of non-acceptance. Both Peligrino and Buenafe testified in their defense, denying the accusations and suggesting an entrapment by Dr. Feliciano and the NBI.

Issues:

1. Whether Peligrino demanded and received the envelope with the boodle money.
2. The credibility of Dr. Feliciano's testimony.
3. Peligrino's right to equal protection of the law.

Court's Decision:

The Supreme Court upheld the Sandiganbayan's decision, finding Peligrino guilty beyond reasonable doubt for violating Section 3(b) of the Anti-Graft Law. The Court clarified that mere receipt of a gift or benefit in relation to an official's duties, without need for demand, suffices for conviction. The defense's argument on brief possession was rejected, as the Court considered the actions of Peligrino indicative of acceptance. The questions on the credibility of the witnesses were deferred to the trial court's judgment, as it had the advantage of directly assessing testimonies.

Doctrine:

1. Mere receipt of a gift or benefit by a public official, in connection with their official duties, is sufficient for conviction under Section 3(b) of the Anti-Graft Law, without the need for an explicit demand.
2. The assessment of the credibility of witnesses primarily lies with the trial court.

Class Notes:

- In establishing guilt under Section 3(b) of the Anti-Graft Law, focus on the public official's receipt or acceptance of a gift or benefit related to their official functions. The key elements include:

1. The offender being a public officer.
2. The officer requesting, receiving, or expecting to receive a gift, present, share, percentage, or benefit.
3. The gift or benefit being directly or indirectly connected to a contract or transaction involving the government that the officer has the official capacity to intervene under the law.

- Witness credibility assessments are generally the domain of the trial court, given its firsthand ability to observe demeanor and other non-verbal cues.

Historical Background:

This case illustrates the judicial handling of corruption charges within government agencies in the Philippines, emphasizing the no-tolerance policy against graft and corruption. It showcases the procedural journey from accusation through trial, leading to conviction based on evidence gathered during entrapment operations, supplemented by witness testimonies. The ruling reiterates the importance of integrity and accountability in public service, underlining the strict interpretation of laws against graft and corruption.