

**\*\*Title:\*\*** Mayor Linda Cadio-Palacios vs. People of the Philippines

**\*\*Facts:\*\*** This case revolves around Linda Cadio-Palacios, then Mayor of Culasi, Antique, and Victor S. Venturanza, the Municipal Security Officer, who were accused under Section 3(b) of R.A. No. 3019 (Anti-Graft and Corrupt Practices Act) for allegedly demanding and receiving money from Grace Superficial of L.S. Gamotin Construction in connection with several municipal infrastructure projects. The complaint was grounded on their supposed demand for bribes to facilitate the release of final payments for projects initiated under Palacios' predecessor but remained partially unpaid. Accusations were formalized in January 1999 when the final payment was being processed, leading to their voluntary surrender, posting bail, and subsequent trial. The prosecution anchored its case on the testimony of Grace Superficial, who claimed she was coerced into providing bribes to ensure the release of due payments. In contest, the defense argued against Superficial's claims, asserting that such demands and transactions—if ever they occurred—were not within their conduct or knowledge, suggesting political motivations behind the accusation.

**\*\*Issues:\*\***

1. Whether the Sandiganbayan erred in giving credence to the testimony of the prosecution's sole witness, Grace Superficial.
2. Whether the elements necessary to establish a violation of Section 3(b) of R.A. No. 3019 were satisfactorily proven.
3. Whether the acts of demanding and receiving, as stipulated under Section 3(b) of R.A. No. 3019, were committed by the petitioners.

**\*\*Court's Decision:\*\*** The Supreme Court upheld the Sandiganbayan's decision, convicting Cadio-Palacios and Venturanza of the charges. The Court dismissed the objection to the credibility of Superficial's testimony, recognizing the lower court's better position in verifying witness credibility. It affirmed that the elements of the offense under Section 3(b) of R.A. No. 3019 were sufficiently proven—identifying Cadio-Palacios as a public officer who intervened in an official capacity in the transactions under dispute and established that she indeed participated in demanding and receiving bribes. The Court ruled that acts of both demanding and receiving were substantiated through corroborative testimonies and documentary evidence, rejecting the defense's argument of political motivation behind the accusations.

**\*\*Doctrine:\*\*** The Supreme Court reiterates the established doctrine that in corruption cases under Section 3(b) of R.A. No. 3019, proof of either demanding, receiving, or both

demanding and receiving any gift, present, share, percentage, or benefit by a public officer in connection with any contract or transaction where the public officer has official capacity under the law suffices for conviction. Also, it emphasized that factual findings of the Sandiganbayan hold substantial weight unless proven to fall under specific exceptions.

**\*\*Class Notes:\*\***

- In any accusation under Section 3(b) of R.A. No. 3019, the prosecution must establish the offender's public official status, the act of demand or receipt (or both) of any undue advantage, the intentional nature of such act(s), its connection with government contracts or transactions, and the official capacity of the accused in said transactions.
- The credibility of a witness's testimony, particularly in cases handled by the Sandiganbayan, is accorded great respect unless certain exceptions apply.
- Conviction for violations of the Anti-Graft and Corrupt Practices Act does not require absolute certainty but rather moral certainty to a degree that would convince an unprejudiced mind.

**\*\*Historical Background:\*\*** The case underscores the enduring challenges in fighting corruption within local government units in the Philippines. It illustrates the legal framework set by R.A. No. 3019 to combat corruption among public officers and reiterates the judiciary's role in interpreting and implementing said laws through case law. This decision contributes to the body of jurisprudence affirming the commitment to holding public officials accountable for corrupt practices, emphasizing due process, and the evidentiary standards required for conviction.