

Title: ****Demetrio R. Tecson vs. Sandiganbayan and People of the Philippines****

Facts:

The case revolves around Demetrio Tecson, the Municipal Mayor of Prosperidad, Agusan del Sur, and Mrs. Salvacion Luzana, a resident and an investor in a ticket-selling business. In September 1989, Tecson and Luzana agreed to engage in a business where tickets sold for P100 each would, after 30 days, yield a return of P200 or more. Tecson contributed no monetary investment but participated as an agent in selling tickets. On September 27, 1989, after selling 40 tickets, Tecson secured a Mayor's Permit for the business but refused to release it unless given a P4,000 cash advance by Luzana. Following the issuance of another business permit under a different name, the business's permit was revoked on October 17, 1989, upon Tecson's presiding over the Sangguniang Bayan session.

Legal proceedings against Tecson included an administrative case filed with the DILG (later dismissed by the Sangguniang Panlalawigan of Agusan del Sur), a civil case for damages settled by compromise, and a criminal complaint with the Ombudsman for violating R.A. No. 3019 (the Anti-Graft and Corrupt Practices Act), which was subsequently filed with the Sandiganbayan. The Sandiganbayan convicted Tecson, imposing a penalty of imprisonment and perpetual disqualification from public office.

Issues:

1. Whether the dismissal of the administrative case serves as a bar by prior judgment against the criminal prosecution.
2. Whether the criminal trial violated Tecson's constitutional protection against double jeopardy.
3. Whether Tecson's guilt was proven beyond reasonable doubt.

Court's Decision:

1. The Supreme Court held that res judicata does not apply to criminal proceedings and that administrative dismissal does not bar criminal prosecution. Public officials may face civil, criminal, and administrative liabilities separately for wrongful actions.
2. The Court clarified that double jeopardy does not attach to administrative proceedings, thus, Tecson's trial and conviction by the Sandiganbayan did not violate the constitutional protection against double jeopardy.
3. The Court affirmed Tecson's guilt beyond a reasonable doubt based on the concurrence of the elements of the crime under R.A. No. 3019. The testimony of prosecution witnesses and the surrounding circumstances sufficiently proved Tecson's unlawful actions. The Court

found no reason to disturb the Sandiganbayan's findings, emphasizing its principle of not interfering with the trial court's credibility assessment unless there is a clear abuse of discretion or misapprehension of facts.

Doctrine:

The decision reaffirmed that an administrative case's dismissal does not preclude criminal prosecution for the same acts. Moreover, it underscored the separate and distinct nature of civil, criminal, and administrative liabilities of public officers. The case also reiterated the principle that the Supreme Court respects the factual findings of lower courts unless there are compelling reasons to do otherwise.

Class Notes:

- Res judicata applies to finished civil litigation and does not preclude criminal proceedings.
- Public officials can face separate civil, criminal, and administrative actions for the same conduct.
- Double jeopardy attaches only to criminal proceedings and not to administrative hearings.
- The elements necessary to prove violation of R.A. No. 3019, Section 3, include being a public officer who requests/receives gifts in consideration of facilitating government permits or licenses.
- The Supreme Court gives great weight to the trial court's assessment of witness credibility unless there is evidence of misapprehension of facts or grave abuse of discretion.

Historical Background:

This case underscores the complexities of legal accountability for public officials in the Philippines, particularly regarding corrupt practices. It exemplifies the judiciary's role in interpreting legislative intent in anti-corruption laws and ensuring that public officials are held to account for their actions within the public office's scope. The decision reaffirms the principles aimed at maintaining the integrity of public service and the separation of liabilities in pursuit of justice.