

Title: Imelda R. Marcos vs. The Honorable Sandiganbayan and The People of the Philippines

Facts:

This case arose from the indictment of Imelda R. Marcos and Jose P. Dans, Jr. for violating Section 3(g) of Republic Act No. 3019, known as the Anti-Graft and Corrupt Practices Act. The Information accused them, as public officers and in relation to their offices, of unlawfully entering into a Lease Agreement with the Philippine General Hospital Foundation, Inc. (PGHFI) on behalf of the Light Rail Transit Authority (LRTA), resulting in terms manifestly and grossly disadvantageous to the government.

The case was allocated to the Sandiganbayan's First Division. However, due to the absence of a unanimous decision among its members, a special division of five justices was constituted, though it was later dissolved after three justices reached a consensus.

Imelda Marcos, in her role as Chairman of PGHFI and Jose P. Dans, Jr., in his capacity as the Vice Chairman of LRTA, signed the Lease Agreement. Subsequently, PGHFI entered into a Sub-lease Agreement with the Transnational Construction Corporation (TNCC) on significantly more favorable terms, suggesting a disadvantageous arrangement for the government in the original lease.

Issues:

1. Whether Imelda R. Marcos signed the Lease Agreement as a public officer, thereby acting on behalf of the government.
2. Whether the Lease Agreement was manifestly and grossly disadvantageous to the government.

Court's Decision:

The Court granted Imelda Marcos' Motion for Reconsideration, leading to her acquittal. It resolved that:

1. Marcos did not sign the Lease Agreement as a public officer but as the Chairman of PGHFI. Despite her concurrent role as the ex-officio Chairman of LRTA, there was no evidence indicating her direct involvement in authorizing the agreement on behalf of LRTA.
2. The Lease Agreement, compared alone or with the Sub-lease Agreement, did not stand as manifestly and grossly disadvantageous to the government due to a lack of comparative standards showing detriment to LRTA or the government.

Doctrine:

The Court reaffirmed the presumption of innocence in criminal cases, emphasizing that guilt

must be proven beyond reasonable doubt. It also highlighted the principle that ambiguities or doubts in the interpretation of inculpatory facts must be resolved in favor of the accused.

Class Notes:

- In criminal cases, the prosecution bears the burden of proof, requiring guilt to be established beyond reasonable doubt.
- A public officer's guilt under Section 3(g) of R.A. No. 3019 necessitates proof that the officer acted on behalf of the government and that the act resulted in a contract or transaction manifestly and grossly disadvantageous to the government.
- Legal statutes relevant:
 - Section 3(g) of Republic Act No. 3019 as amended (The Anti-Graft and Corrupt Practices Act)

Historical Background:

The case reflects the post-Marcos era efforts in the Philippines to hold former officials accountable for acts of corruption and misuse of office under Republic Act No. 3019, within the broader context of restoring integrity in public service and upholding justice through due legal processes.