

Title: Dans and Marcos vs. People of the Philippines and the Honorable Sandiganbayan

Facts:

The case involves former Minister of Human Settlements Imelda R. Marcos and former Transportation and Communications Minister Jose P. Dans, Jr., who were accused of violating the Anti-Graft and Corrupt Practices Act (Republic Act No. 3019). In 1984, Marcos and Dans, in their capacities as officials of the Light Rail Transit Authority (LRTA) and the Philippine General Hospital Foundation, Inc. (PGHFI), entered into lease agreements for two LRTA-owned lots in Pasay and Sta. Cruz, Manila. The lots were subsequently subleased to private entities at significantly higher rates. Prosecution argued these transactions were grossly disadvantageous to the government, leading to their indictment in 1992 across five criminal cases.

Procedurally, the case went to trial where defense motions, including a demurrer to evidence filed by Dans, were denied by the Sandiganbayan. Despite presenting a witness to prove fair lease prices, the court found the agreements manifestly disadvantageous to the government. In 1993, the court acquitted the petitioners in three out of five cases but found them guilty in two, leading to their filing motions for reconsideration and eventually appealing to the Supreme Court.

Issues:

1. Constitutionality of Section 3(g) of R.A. 3019.
2. Sufficiency of the criminal informations.
3. Proper representation by counsel during trial.
4. Validity of the decision rendered by the First Division of Sandiganbayan.
5. Denial of Dans' demurrer to evidence.
6. Weight of evidence and fairness of trial.
7. Alleged bias and impartial conduct by the Sandiganbayan justices during the trial.

Court's Decision:

The Supreme Court affirmed the conviction of Imelda Marcos in one case, ordering her to reimburse the LRTA for the prejudiced caused by one lease agreement, but reversed the convictions in another case for both Marcos and Dans on grounds of reasonable doubt. The Court found the constitutional challenge to Section 3(g) of R.A. 3019 unfounded, deemed the criminal informations sufficient, and held that Marcos was adequately represented by counsel.

Regarding procedural issues, the Supreme Court criticized the Sandiganbayan, particularly for relying on defence evidence prematurely in denying Dans' demurrer to evidence and questioned the validity of the First Division ruling owing to a jurisdictional and procedural oversight involving the creation and dissolution of a Special Division.

Doctrine:

The Supreme Court reiterated principles related to the handling of demurrers to evidence, emphasizing that such motions should be resolved solely based on the prosecution's evidence. It also highlighted the procedural requirement for a unanimous decision within the Sandiganbayan's divisions or otherwise the formation of a Special Division. Lastly, the need for judicial impartiality and refraining from assuming roles that may convey a lack of neutrality was underscored.

Class Notes:

- The case reaffirms the standard for the constitutionality of statutes, particularly the clear and convincing burden required to declare a law unconstitutional.
- A demurrer to evidence should be decided based solely on the prosecution's evidence, without premature consideration of defence evidence.
- The impartiality of judges during trials is critical to ensure fairness and maintain public confidence in judicial proceedings.
- Judges should limit their participation to clarificatory questions and must not appear to side with the prosecution to preserve the due process rights of the accused.

Historical Background:

This case sheds light on the legal aftermath of the Marcos regime in the Philippines, particularly on allegations of corruption and misuse of public position for personal gain. The transactions scrutinized occurred during a period of significant political and economic turbulence in the Philippines, reflecting broader themes of accountability and reform in the post-Marcos era.