

### Title:

Graciano P. Dela Chica & Evan C. Aceveda vs. Sandiganbayan and People of the Philippines

### Facts:

Graciano P. Dela Chica, the incumbent Municipal Mayor, and Evan C. Aceveda, the Municipal Engineer of Baco, Oriental Mindoro, were charged before the Sandiganbayan in Criminal Case No. 25188 for violation of Section 3(e) of Republic Act No. 3019, otherwise known as the Anti-Graft and Corrupt Practices Act. The charge arose from the accusation that, on or around November 28, 1995, Dela Chica and Aceveda, acting in concert, unlawfully caused undue injury to the government by making revisions to the completion of the municipal building without prior approval, leading to a cost deficiency of P375,682.32.

The prosecution's charge asserted that the petitioners had engaged in their actions while performing their official functions and had taken undue advantage of their positions. The petitioners entered not guilty pleas following their arraignment on August 20, 1999. They contested the sufficiency of the information through a motion for a bill of particulars, which was subsequently denied by the Sandiganbayan on the basis that the arraignment had precluded any amendments beyond matters of form.

A motion for suspension pendente lite of the petitioners, in accordance with Section 13 of R.A. No. 3019, was filed by the prosecution and granted by the Sandiganbayan in a resolution dated April 14, 2000, which led the petitioners to seek temporary restraining order/preliminary injunction against the suspension order, claiming the information to be invalid due to a lack of specification of "evident bad faith, manifest partiality or gross inexcusable negligence." The Sandiganbayan denied the motion for reconsideration and upheld the suspension in a resolution dated September 1, 2000.

### Issues:

1. Whether the Information under which the petitioners were charged was valid, particularly in relation to the requirement to allege "manifest partiality, evident bad faith, or gross inexcusable negligence" as defined by R.A. 3019.

### Court's Decision:

The Supreme Court granted the petition, ruling that the information was indeed defective for failing to specifically allege the elements of "manifest partiality, evident bad faith, or gross inexcusable negligence." The Court emphasized that each element of the offense must be clearly stated in the information to inform the accused properly about the charges

against them and enable them to prepare their defense. Owing to the defective information, the Court set aside the Sandiganbayan's resolutions and dismissed the criminal case against Dela Chica and Aceveda.

### Doctrine:

This case reiterates the doctrine that an information is insufficient if it fails explicitly to allege every element of the offense charged. Particularly under Section 3(e) of R.A. No. 3019, the acts constituting the offense must be described in a manner that unequivocally includes the elements of "manifest partiality, evident bad faith, or gross inexcusable negligence."

### Class Notes:

- **Essential Elements of Violation Under Section 3(e) of R.A. No. 3019**: 1) The accused must be a public officer, or a private person charged in conspiracy with a public officer; 2) The act/s must be committed in relation to the public officer's official duties or position; 3) It must cause undue injury to any party, including the government; 4) The act/s must confer unwarranted benefits, advantage or preference to the offending party; and 5) The act/s must be done with manifest partiality, evident bad faith, or gross inexcusable negligence.

- **Interpretation of Legal Standards in Information**: The Information must state the acts or omissions constitutive of the offense in ordinary and concise language but in terms sufficient for a person of common understanding to know the offense charged. Material facts that establish the essential elements of the offense as defined by law must be accurately and clearly alleged.

### Historical Background:

In the context of efforts to combat corruption within the Philippines, the decision underscores the judiciary's role in upholding the requisites for the proper framing of charges against public officials under the Anti-Graft and Corrupt Practices Act. The specificity required in crafting informations ensures that the accused's rights are protected and that only well-substantiated cases proceed to trial. This case illustrates the balance between the state's interest in prosecuting corruption and the necessity of adhering to procedural safeguards for the accused.