

Title:

****Ariel C. Santos vs. People of the Philippines and The Sandiganbayan****

Facts:

In Criminal Case No. 21770, Ariel Santos, then a Labor Arbiter of the National Labor Relations Commission (NLRC) in San Fernando, Pampanga, was charged with violating Section 3(e) of Republic Act No. 3019, otherwise known as the Anti-Graft and Corrupt Practices Act. The charge related to his allegedly partial actions favoring Abraham Mose in NLRC-RAB Case No. RO3-198-79 against Conrado L. Tiu, owner of Plaza Hotel/Apartments. Despite pending motions for reconsideration and oppositions to the motion for execution, Santos issued a writ of execution on March 11, 1993, and an alias writ of execution on June 15, 1993, causing undue injury to Tiu and benefiting Mose.

Santos pleaded not guilty and, during the trial, his actions were dissected, with the prosecution proving the undue injury caused to Tiu and the defense focusing on the procedural steps Santos believed were ministerial in his capacity as a labor arbiter. The defense argued that the decision sought to be enforced had already become final and executory, relegating Santos' act to simply carrying out his official duties.

Issues:

1. Whether Santos acted with manifest partiality in issuing the writs of execution in favor of Abraham Mose.
2. Whether Conrado L. Tiu suffered undue injury as a result of Santos' actions.

Court's Decision:

The Supreme Court affirmed the Sandiganbayan's decision, finding Santos guilty of violating Section 3(e) of R.A. No. 3019. The Court held that Santos indeed acted with manifest partiality in issuing the writs of execution despite pending motions for reconsideration and the existence of a temporary restraining order. Furthermore, the Court recognized that Tiu suffered undue injury, not only due to potential financial losses but also because of the costs incurred in seeking legal redress against the writs' enforcement.

Doctrine:

This case reaffirmed the principles surrounding the violation of Section 3(e) of R.A. No. 3019, which penalizes public officers for causing undue injury to any party or giving unwarranted benefits through manifest partiality, evident bad faith, or gross inexcusable negligence in the discharge of official functions. It underscores the importance of public

officials' adherence to due process and impartiality in executing their duties.

Class Notes:

- **Key Elements of Violation of Section 3(e) R.A. No. 3019**: Public officer acting with manifest partiality, evident bad faith, or inexcusable negligence causes undue injury or gives unwarranted benefits in discharging functions.
- **Due Process and Impartial Execution of Duties**: Public officials must consider pending legal remedies and adhere to constitutional rights to due process before executing potentially damaging orders.
- **Concept of 'Undue Injury'**: Aligned with the civil law concept of actual damage, implying a necessity for fair compensation commensurate to the loss directly caused by the wrongful act.

Historical Background:

This case is situated within the milieu of efforts to combat corruption and abuse of power in the Philippines, emphasizing the accountability of public officials. It illustrates the legal mechanisms designed to protect individuals and entities from undue prejudice arising from the corrupt or partial actions of those in positions of public trust, particularly in the adjudication of labor disputes.