

****Title:** People of the Philippines vs. Benjamin “Kokoy” T. Romualdez and the Sandiganbayan**

****Facts:****

This case originated when the Office of the Ombudsman charged Benjamin “Kokoy” T. Romualdez with a violation of Section 3(e) of Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act) before the Sandiganbayan (Criminal Case No. 26916). The charge related to Romualdez’s actions during his tenure as the Provincial Governor of Leyte where, without abandoning his position and using his influence with then-President Ferdinand E. Marcos (his brother-in-law), he had himself appointed as Ambassador to various countries, leading to him collecting dual compensation, allegedly causing damage to the government amounting to PHP 5,806,709.50.

Romualdez moved to quash the information on grounds that the facts do not constitute an offense and that the criminal liability had been extinguished by prescription. He argued that the acts charged were not covered by the cited law and that there was no damage to the government since he rendered services for both positions. The Office of the Ombudsman opposed, stating the charge was under appropriate law sections.

The Sandiganbayan granted Romualdez’s motion to quash, concluding that receiving compensation for actual services rendered does not constitute causing damage to the government. The court also dismissed the argument on prescription. The People’s subsequent motion for reconsideration was denied.

The People then filed a Petition for Certiorari under Rule 65 of the Revised Rules of Court with the Supreme Court, assailing the Sandiganbayan’s resolutions on grounds of grave abuse of discretion.

****Issues:****

1. Whether the Sandiganbayan committed grave abuse of discretion in granting the motion to quash.
2. Whether the facts charged constitute the offense of violating Section 3(e) of RA 3019.
3. Whether the criminal action or liability has been extinguished by prescription.
4. The proper recourse in questioning the Sandiganbayan’s resolutions.

****Court’s Decision:****

The Supreme Court granted the petition, annulling the questioned resolutions of the Sandiganbayan. The Court found that the Sandiganbayan gravely abused its discretion by misapplying the legal standards for quashing an information and by prematurely making rulings on the merits of the case based on incorrect legal assumptions and without proper trial. It ordered the Sandiganbayan to proceed with the trial on the merits of the case based on the information filed.

****Doctrine:****

This case reiterates that the sufficiency of an Information is evaluated on whether the facts alleged, if hypothetically admitted, establish the essential elements of the offense charged. It also highlights the principle that an Information only needs to state the ultimate facts and not the evidentiary details, which are to be presented during the trial.

****Class Notes:****

1. ****Elements of Violating Section 3(e), R.A. No. 3019****: a) The accused is a public officer; b) Acting with manifest partiality, evident bad faith, or inexcusable negligence; c) Causing undue injury to any party, including the government, or giving any unwarranted benefits, advantage, or preference.
2. ****Rule on Motion to Quash****: A motion to quash can be granted if the facts charged do not constitute an offense, but the information must specify the ultimate facts constituting the offense and not evidentiary or finer details.
3. ****Doctrine on Double Compensation****: The 1973 Constitution (Article XV, Section 5) prohibits public officials from receiving double compensation unless authorized by law, highlighting the importance of understanding constitutional provisions in public service.
4. ****Grave Abuse of Discretion****: An action by a court is considered with grave abuse of discretion if it is a capricious or whimsical exercise of judgment equivalent to lack of jurisdiction, highlighting the importance of judicial adherence to procedural norms and standards.

****Historical Background:****

The case reflects the complexities of accountability and legal procedures involving public officials in the Philippines, emphasizing the judiciary's role in interpreting statutory provisions and ensuring that public officers act within the bounds of law. The intricate legal battle showcases the intricate dance between procedural law and substantive justice within the context of anti-corruption efforts under Philippine law.