

Title: Uriarte vs. People of the Philippines

Facts:

Demie L. Uriarte, the Municipal Assessor of Carrascal, Surigao del Sur, was convicted by the Regional Trial Court (RTC) of Cantilan, Surigao del Sur for violating Section 3(e) of Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act) for making unauthorized alterations on tax declarations. The alterations involved changes in boundary descriptions and locations of properties previously declared, which directly benefited Uriarte and his father by making it appear their properties adjoined those of the property originally declared under Joventino Correos and subsequently restored to original entries upon complaint. Evelyn Arpilleda, through legal counsel, initially notified Uriarte about the alterations, and upon lack of satisfactory response, brought the matter to the Office of the Ombudsman, which in turn initiated prosecution leading to Uriarte's conviction. Uriarte's motions, including a motion to quash the information and a motion to lift the order of preventive suspension, were eventually denied, and the RTC found him guilty. His appeal to the Sandiganbayan asserted procedural and substantive issues, notably claiming a violation of his rights to be informed of the nature of the accusation against him and challenging the evidence of "undue injury." The Sandiganbayan affirmed the RTC's decision with modifications regarding penalties but upheld Uriarte's criminal liability.

Issues:

1. Whether Uriarte's actions constituted a violation of Section 3(e) of R.A. 3019.
2. Whether the information provided to Uriarte satisfied his constitutional right to be informed of the accusation against him.
3. Whether Uriarte's act of altering the tax declarations resulted in undue injury and thus falls under the prohibited acts in Section 3(e) of R.A. 3019.

Court's Decision:

The Supreme Court denied Uriarte's petition, affirming the Sandiganbayan and RTC's decisions. It ruled that Uriarte, as a public officer, acted with evident bad faith by unilaterally altering the tax declarations, causing undue injury to the heirs of Joventino Correos and giving unwarranted benefits to himself and his family. The Court found that the information filed against Uriarte sufficiently alleged the elements of the offense under Section 3(e) of R.A. 3019; thus, his right to be informed of the accusation was not violated. The alterations in the tax declarations, especially concerning the boundaries of the

properties involved, resulted in undue injury as they directly affected the property's identity, which could significantly impact its value and ownership. Uriarte's conviction was based on substantive alterations that had real and adverse effects on the parties involved.

Doctrine:

In cases involving violation of Section 3(e) of the Anti-Graft and Corrupt Practices Act (R.A. No. 3019), the elements to be considered are: (1) the offender is a public officer; (2) the action involves manifest partiality, evident bad faith, or gross inexcusable negligence; and (3) such action caused undue injury to any party, including the government or gave any unwarranted benefits, advantage, or preference.

Class Notes:

- **Section 3(e) of R.A. 3019**: It is essential to establish that the public officer's actions, conducted within their official capacity, resulted in undue injury to a party or provided unwarranted benefits through manifest partiality, evident bad faith, or gross negligence.
- **Due Process and Information**: The right to be informed of the nature and cause of the accusation against one is fundamental in ensuring due process; the information must sufficiently allege the elements of the offense.
- **Undue Injury**: In determining undue injury, the actual effect on the parties involved, and not the actions' intent, is crucial. Alterations that significantly change property identities or boundaries can cause undue injury.
- **Public Office Accountability**: Public officers are held to a higher standard of accountability; unauthorized actions exceeding the scope of authority that result in harm to others or benefit the officer or related parties violate anti-corruption laws.

Historical Background:

The case highlights the responsibility of public officers to act within the confines of their authority and the legal repercussions of using one's public office to unduly favor personal or familial interests. It underscores the judiciary's role in upholding accountability and integrity within the public sector, especially in matters concerning property rights and public administration.