

Title: *Marquez and Caunan vs. People of the Philippines and Sandiganbayan* Digest)

Facts:

In January 1996, Joey P. Marquez, then City Mayor of Parañaque, along with other city officials including Ofelia C. Caunan, engaged in several transactions involving the purchase of “walis ting-ting” (brooms) which were found to be grossly overpriced, thus violating Section 3(g) of the Anti-Graft and Corrupt Practices Act (R.A. No. 3019). The Commission on Audit (COA) conducted an audit of these transactions and found substantial overpricing. As a result, several Informations were filed against Marquez, Caunan, and others in the Sandiganbayan (Criminal Case Nos. 27944, 27946, 27952, 27953, & 27954).

Despite efforts to challenge the COA’s findings, including motions for reconsideration and an appeal to the COA itself, Marquez and Caunan were ultimately found guilty by the Sandiganbayan in August 2007. Their separate motions for reconsideration were denied, leading to their appeal to the Supreme Court via petitions for review on certiorari under Rule 45.

Issues:

1. Whether the Sandiganbayan erred in finding the petitioners guilty of violating Section 3(g) of R.A. No. 3019.
2. Whether the testimony of the COA’s special audit team and their report constituted hearsay evidence and thus inadmissible.
3. Applicability of the Arias and Magsuci rulings to exempt Marquez from liability.

Court’s Decision:

The Supreme Court reversed the Sandiganbayan’s decision, acquitting Marquez and Caunan. The Court found that the prosecution did not sufficiently prove the purchases were grossly overpriced beyond reasonable doubt—a crucial element for a conviction under Section 3(g) of R.A. No. 3019. The Court criticized the reliance on hearsay evidence and non-identical samples in determining overpricing, stating this did not meet the requisite burden of proof. The Court also noted a lack of necessity to address whether the doctrines in Arias and Magsuci applied, given the outcome.

Doctrine:

The case reiterated the importance of proving every element of a crime beyond reasonable doubt in criminal proceedings. It also highlighted the inadmissibility of hearsay evidence and the crucial distinction between negligence and conspiracy in criminal liability.

Class Notes:

- **Key Concept:** Proof Beyond Reasonable Doubt - In criminal cases, the prosecution's burden is to prove the accused's guilt beyond reasonable doubt.
- **Doctrine Cited:** The decision reaffirmed that penal laws are strictly construed against the government and that accused persons enjoy the presumption of innocence.
- **Relevant Statute:** Section 3(g) of Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act) - requires proving (1) the accused is a public officer, (2) they entered into a contract or transaction on behalf of the government, and (3) the contract or transaction is grossly and manifestly disadvantageous to the government.

Historical Background:

This case highlights the ongoing battle against corruption within the Philippine government, emphasizing the judiciary's role in scrutinizing allegations of corruption and upholding the principles of fair trial and due process. It also reflects the challenges in proving graft and corruption cases, particularly the stringent requirement of evidence beyond reasonable doubt.