

### Title:

Maderazo, et al. v. People of the Philippines

### Facts:

In an Information filed before the Sandiganbayan on October 22, 1997, Municipal Mayor Melchor G. Maderazo, Victor Maderazo, Jr., a Sangguniang Bayan member, and Seniforo Perido, the Caibiran Police Station Chief, were charged with grave coercion for allegedly forcibly ejecting Medaria Verutiao from her market stall in the public market of Caibiran, Biliran, on January 27, 1997. Despite all accused pleading not guilty, the Sandiganbayan issued a Pre-Trial Order confirming their public office positions and summarized the circumstances surrounding Verutiao's ejection and the subsequent inventory and confiscation of her goods.

The prosecution's case primarily rested on Verutiao's testimony, which detailed her lease agreement with the Municipality of Caibiran for a market stall she constructed at her expense, expecting reimbursement as per Municipal Ordinance No. 2, Series of 1984. Despite partial reimbursement, disputes over unpaid rentals and the municipality's failure to fully reimburse her led to interactions that culminated with her receiving an order from Mayor Maderazo to vacate the stall for rental delinquency. Verutiao and her husband contested this demand, citing the ordinance that allowed for her expenses to be debited against her rentals. Mayor Maderazo then padlocked the stall on January 21, 1997, and had its contents inventoried and seized on January 27, 1997.

For the defense, only Victor Maderazo testified, stating he was present to witness the inventory at Mayor Maderazo's request but claimed it was conducted orderly without implying involvement in the padlocking or the decision to evict Verutiao.

### Issues:

1. Whether the act of forcibly opening Verutiao's stall, inventorying, and confiscating the goods constituted grave coercion or unjust vexation.
2. Whether the accused, particularly Mayor Maderazo, had legal authority to undertake the eviction, padlocking, and seizure of goods due to rental delinquency without judicial intervention.
3. Whether the prosecution proved beyond reasonable doubt the guilt of the accused for the crime of unjust vexation.

### Court's Decision:

The Sandiganbayan acquitted the accused of grave coercion but found Mayor Melchor Maderazo, Victor Maderazo, Jr., and Seniforo Perido guilty of unjust vexation. It was ruled they had no authority to perform their actions such as padlocking the stall and confiscating goods without resorting to lawful judicial or administrative processes intended for addressing rental delinquencies. The actions taken by the accused, therefore, caused unnecessary annoyance to Verutiao. However, on appeal, the Supreme Court affirmed the decision with modification, acquitting Seniforo Perido due to insufficient evidence of his involvement beyond witnessing the inventory. The guilt of Melchor and Victor Maderazo for unjust vexation was upheld.

**### Doctrine:**

The Supreme Court reiterated the doctrine that public officials cannot take the law into their own hands to enforce rights or execute duties outside the confines of the law. Performing actions that unjustifiably annoy or irk an individual without adhering to due legal procedures constitutes unjust vexation.

**### Class Notes:**

- In cases involving the enforcement of municipal ordinances or contracts, the due process of law must be strictly followed, and any deviation may result in criminal liability.
- Unjust vexation can be committed without physical presence or direct act of intimidation, as long as the actions indirectly cause annoyance, irritation, or disturbance.
- Good faith and adherence to lawful procedures are paramount for public officials in the execution of their duties.

**### Historical Background:**

This case highlights issues surrounding the proper enforcement of municipal ordinances, particularly concerning public market stalls, and underscores the limits of authority vested in local government officials under Philippine law, specifically in handling cases of contractual disputes and local revenue collection. It serves as a critical reminder of the principles of rule of law and due process in public administration.