

Title: People of the Philippines vs. Juvenal Azurin y Blanquera

Facts:

On November 13, 2013, Juvenal Azurin, the Regional Director of the Philippine Drug Enforcement Agency (PDEA) in Region II, was accused of threatening Jaime J. Clave, one of his subordinates, during a late-night phone call. Azurin was charged under Article 282, paragraph 2, of the Revised Penal Code for Grave Threats. He pleaded “not guilty,” and the Sandiganbayan proceeded with the trial.

Version of the Prosecution:

- Jaime J. Clave testified that he received a threatening phone call from Azurin.
- Witnesses April Rose Mendoza (IO2 Mendoza), Maynard Agleham (IO1 Agleham), Rosenia Cabalza, and SPO1 Ricky M. Ramilo corroborated aspects of the incident.
- Clave reported the incident to the police and filed complaints with both the Office of the Ombudsman and the PDEA Internal Affairs Services Office.

Version of the Defense:

- Azurin admitted making a phone call but denied it was threatening, claiming it was about Clave’s reassignment.
- After being charged and convicted by the Sandiganbayan, Azurin appealed, arguing the prosecution failed to prove guilt beyond reasonable doubt and raising issues on evidence admissibility.

Issues:

1. Was the appeal filed by Azurin the correct mode from the Sandiganbayan to the Supreme Court?
2. Did the Sandiganbayan correctly find Azurin guilty beyond reasonable doubt of the crime charged?

Court’s Decision:

The Supreme Court held the appeal method used was correct, affirming the Sandiganbayan’s judgment of guilt for Grave Threats but modified the imprisonment period to two (2) months and one (1) day. The Court found the accounts of the prosecution’s witnesses credible and Azurin’s defense unconvincing.

Doctrine:

- The case reaffirmed the doctrine of appellate courts generally deferring to trial courts’ assessment of witness credibility.

- It established that for grave threats to be consummated, the wrongful threat must be known to the person threatened.

Class Notes:

- Elements of Grave Threats under Article 282 of the RPC: (1) the offender threatens another person with the infliction upon his person of a wrong; (2) such wrong amounts to a crime; and (3) the threat is not subject to a condition.

- In criminal cases decided by the Sandiganbayan in its original jurisdiction, an appeal to the Supreme Court is properly made via a notice of appeal filed with the Sandiganbayan (Section 1(a), Rule XI of the 2018 Revised Internal Rules of the Sandiganbayan).

Historical Background:

This case is notable for clarifying the proper mode of appeal from the Sandiganbayan to the Supreme Court under its unique rules, shedding light on procedural aspects often encountered in public officer cases and confirming the courts' stance on evaluating credibility and evidence in threats-related cases.