

Title:

P/Insp. Rodolfo Samson, et al. vs. Hon. Teofisto T. Guingona, Jr., et al.: A Case on the Non-Interference in Preliminary Investigations

Facts:

In a distressing incident on July 13, 1995, in Barangay Paligsahan, Quezon City, Philippines, Datu Gemie Sinsuat was fatally shot by patrolmen of the Central Police District Command. Following this, a murder complaint was filed against Rodolfo Samson and others involved in August 1995. During the investigation, some accused claimed self-defense, arguing a shootout occurred, while others asserted they arrived post-event.

Prosecution Attorney Emmanuel Velasco, upon conclusion of the investigation on October 3, 1995, filed an information for murder against the petitioners and others, excluding two who became state witnesses. Following a Very Urgent Motion by petitioners questioning the existence of probable cause, the trial court on October 9 and 18, 1995, found probable cause against some accused but ordered a reinvestigation regarding Samson, Totanes, Bustinera, and Cruz due to procedural concerns.

Petitioners, foregoing a motion for reconsideration, approached the Supreme Court on February 6, 1996, seeking to enjoin the reinvestigation ordered by the trial court, fearing potential re-arrest.

Issues:

The critical legal issue deliberated by the Supreme Court was whether an injunction could be issued to stop the Secretary of Justice from conducting a reinvestigation as ordered by the trial court for determining probable cause.

Court's Decision:

The Supreme Court dismissed the petition, upholding the principle of non-interference in the conduct of preliminary investigations or reinvestigations. The Court underscored that injunctions to restrain criminal prosecution are generally disallowed unless in exceptional circumstances, none of which were applicable to the petitioners' case. The justices argued that allowing such an injunction would unjustly limit the investigating prosecutor's discretion in determining what constitutes sufficient evidence for establishing probable cause.

Doctrine:

The doctrine established reiterates the general rule against the issuance of writs of

prohibition or injunction to enjoin or restrain criminal prosecution, especially during the preliminary investigation or reinvestigation stages. Exceptions exist but are applied strictly and were deemed not applicable in this particular instance.

Class Notes:

1. **General Rule on Injunctions:** Courts typically do not issue injunctions to interfere with ongoing criminal prosecutions, particularly at the preliminary investigation or reinvestigation phases.
2. **Exceptions to the Rule:** While there are ten enumerated exceptions allowing for such injunctions, including protection of constitutional rights and avoidance of persecution, these are strictly construed and were not found applicable in the case at hand.
3. **Doctrine of Non-Interference:** The decision reinforces the judiciary's stance on the discretionary powers of prosecutors during preliminary investigations and the principle of non-interference unless under exceptional circumstances.

Historical Background:

This case underscores the Philippine judicial system's respect for the separation of powers and the principle of non-interference in prosecutorial discretion. It reflects the judiciary's careful balancing act in protecting individuals' rights while ensuring the smooth administration of justice and adherence to legal procedures.