

Title: **Cenita M. Cariaga vs. People of the Philippines**

Facts:

Cenita M. Cariaga, serving as the Municipal Treasurer of Cabatuan, Isabela, was indicted for three counts of malversation of public funds under Article 217 of the Revised Penal Code. These charges were levied in connection with her alleged misappropriation of specific amounts meant as remittances to the Provincial Government of Isabela in the years surrounding 1993. The amounts in question were P2,785.00, P25,627.38, and P20,735.13, in three separate cases (Criminal Case Nos. 1293, 1294, and 1295) heard by the Regional Trial Court (RTC) of Cauayan City, Isabela. Following the trial, on June 22, 2004, the RTC found Cariaga guilty, imposing varying indeterminate penalties across the charges, including perpetual special disqualification and fines corresponding to the malversed amounts. Cariaga's subsequent appeal was mistakenly lodged with the Court of Appeals (CA), which dismissed the appeal for lack of jurisdiction, stating it falls under the Sandiganbayan's purview due to the nature of her position and the offenses charged. This dismissal was reaffirmed upon denial of Cariaga's motion for reconsideration, prompting her to elevate the matter to the Supreme Court.

Issues:

1. Whether the Court of Appeals erred in dismissing Cariaga's appeal due to jurisdictional issues and if such a motion should instead be transferred to the Sandiganbayan.
2. Whether, in the interest of substantial justice, a new trial or thorough review should be granted, particularly in a different appropriate court (i.e., Sandiganbayan or potentially anew at the RTC).

Court's Decision:

The Supreme Court set aside the resolutions of the Court of Appeals, emphasizing the essence of achieving justice over strict adherence to procedural protocols. It underscored the role of procedural rules as instruments to facilitate justice, stating that their rigid application leading to technicalities that frustrate substantial justice must be avoided. Recognizing the inadvertent procedural mistake made in filing the appeal with the CA, as well as the potential deprivation of Cariaga's liberty due to this lapse, the Supreme Court opted for a more lenient approach. It directed that the records of the case be forwarded to the Sandiganbayan for proper consideration and disposition. Furthermore, it placed a warning to the Presiding Judge of the RTC, Branch 20, for committing a procedural error under the threat of administrative sanctions.

Doctrine:

1. **Procedural Rule Relaxation for Substantial Justice**: The Supreme Court can relax procedural rules in criminal cases to prevent deprivation of liberty due to procedural lapses, especially where such adherence to the rules could frustrate substantial justice.
2. **Jurisdiction of the Sandiganbayan Over Appeals**: The Sandiganbayan exercises exclusive appellate jurisdiction over final judgments, resolutions, or orders of regional trial courts in cases where the accused occupy positions below Salary Grade 27, aligning with Presidential Decree No. 1606 as amended by Republic Act No. 8249.

Class Notes:

- **Malversation of Public Funds**: Defined under Article 217 of the Revised Penal Code, implies the act of a public officer who, by reason of his office, misappropriates for his personal use public funds or property.
- **Exclusive Appellate Jurisdiction of Sandiganbayan**: Pertains to cases involving public officials with positions corresponding to Salary Grades below 27, where initial jurisdiction is vested in the RTC.
- **Relaxation of Procedural Rules**: The Supreme Court may override stringent procedural rules in favor of substantive justice, particularly in criminal cases where the liberty of the person is at stake.

Historical Background:

This case illustrates a scenario where the issue of jurisdictional propriety and procedural accuracy in filing appeals comes to the forefront, juxtaposed against the principal pursuit of justice in the legal system of the Philippines. The decision reflects an understanding of the law not as an end in itself but as a means to achieve justice, especially in cases where procedural lapses could result in significant personal liberty deprivations.