

**\*\*Title:\*\*** Sideño v. People of the Philippines: A Case of Misdirected Appeal and the Pursuance of Justice through Equitable Intervention

**\*\*Facts:\*\***

Rolando S. Sideño, Barangay Chairman of Barangay 205, Zone 18, District II, Manila, faced three counts of violations under Section 3(b) of Republic Act No. 3019, or the Anti-Graft and Corrupt Practices Act. The case initiated from Sideño allegedly requesting and receiving money from Aljon Trading, a business engaged in supplying barangay projects, in exchange for awarding them projects. Allan Garcia, owner of Aljon Trading, testified that Sideño demanded a percentage share from the projects' costs, which led to filing a complaint against Sideño for violations of the said act. After the trial, the Regional Trial Court (RTC) found Sideño guilty and sentenced him to imprisonment for each count, including perpetual disqualification from public office. Sideño filed an appeal, mistakenly directed to the Court of Appeals (CA) instead of the Sandiganbayan (SB), within the 15-day reglementary period. The CA, determining it lacked jurisdiction, forwarded the case to the SB, which dismissed the appeal on the ground of improper filing and the lapse of the appeal period.

**\*\*Issues:\*\***

1. Whether the Sandiganbayan should grant due course to Sideño's appeal despite it being initially filed erroneously with the Court of Appeals?
2. Whether Sideño's conviction by the RTC, without the application of the Indeterminate Sentence Law, should be reviewed?

**\*\*Court's Decision:\*\***

The Supreme Court granted the petition, finding merit in Sideño's case. It emphasized that while the appeal was initially improperly filed with the CA, the circumstances and the efforts made by Sideño to comply with procedural rules should not warrant the outright dismissal of his appeal. The Court underscored the importance of equitable considerations over technicalities, especially in safeguarding liberty. Thus, the SC directed the SB to reinstate and review Sideño's appeal, stressing the application of the Indeterminate Sentence Law in determining the appropriate penalty, if necessary.

**\*\*Doctrine:\*\***

The Supreme Court reiterated the doctrine favoring a liberal interpretation of procedural rules in the interest of justice, especially in cases where an inflexible application may result in the unwarranted deprivation of liberty. It stressed the indispensability of reviewing criminal convictions based on proof beyond reasonable doubt to ensure the right to liberty is

rightfully protected.

**\*\*Class Notes:\*\***

1. **\*\*Elements of Violation under RA 3019, Sec. 3(b):\*\*** Must prove a public officer requested or received gifts in connection with a contract in which they can intervene.
2. **\*\*Mandatory Application of the Indeterminate Sentence Law:\*\*** When imprisonment exceeds one year, courts must impose a penalty with both a minimum and maximum duration.
3. **\*\*Right to Appeal within Reglementary Period:\*\*** Filing an appeal within the 15-day period from the promulgation of the decision is crucial. Errors regarding the proper forum do not immediately invalidate a timely appeal.
4. **\*\*Jurisdiction over Appeals:\*\*** Appeals from RTC convictions for salary grade below 27 public officers go to the Sandiganbayan, not the Court of Appeals.

**\*\*Historical Background:\*\***

This case highlights the procedural pitfalls that may jeopardize an accused's right to appeal and the judicial system's flexibility in ensuring fair adjudication. It underscores the court's prerogative to moderate the rigidity of procedural rules to prevent the miscarriage of justice and particularly reflects on the complexities involved in cases under the Anti-Graft and Corrupt Practices Act, especially concerning public officials and their dealings, emphasizing the necessity of applying the Indeterminate Sentence Law to promote rehabilitative justice.