

****Title:** Mejorada v. The Honorable Sandiganbayan and The People of the Philippines******

****Facts:**** This case revolves around Arturo A. Mejorada, a public officer employed as a Right-of-Way Agent in the Office of the Highway District Engineer, Pasig, Metro Manila, who was accused of violating Section 3(e) of Republic Act No. 3019, or the Anti-Graft and Corrupt Practices Act. The accusations stemmed from Mejorada's involvement in facilitating inflated claims for compensation for property owners affected by a government road widening project from October 1977 to February 1978. The Provincial Fiscal filed eight informations against Mejorada for conspiring to approve overestimated claims, resulting in personal financial gain and damage to the government and the claimants. The case progressed to the Sandiganbayan, where all eight cases were jointly tried, resulting in Mejorada's conviction.

****Procedural Posture:**** Mejorada was convicted by the Sandiganbayan on May 23, 1979, for violations of Section 3(e) of Republic Act No. 3019. Following his conviction, Mejorada filed a petition for certiorari with the Supreme Court of the Philippines, challenging the Sandiganbayan's decision across several fronts, including the sufficiency of the charges, the jurisdiction and composition of the Sandiganbayan, the imposition of penalties, and the alleged variance between the offenses charged and proved.

****Issues:****

1. Whether the prosecution sufficiently proved the elements constituting the offense under Section 3(e) of Republic Act No. 3019.
2. Whether the Sandiganbayan was a court of competent jurisdiction duly constituted in accordance with Presidential Decree No. 1606.
3. Whether the penalty imposed upon Mejorada was excessive and contrary to the three-fold rule of the Revised Penal Code.
4. Whether there was a variance between the offense charged in the information and the offense proved.
5. Whether the legal conclusions drawn by the Sandiganbayan were correct.

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

1. The Court held that the prosecution clearly proved all elements of the offense under Section 3(e) of Republic Act No. 3019, refuting Mejorada's claims regarding his role and the resultant damage to the government and the private parties.
2. It upheld the constitutionality and competency of the Sandiganbayan, referencing prior jurisprudence that established the legitimacy of its divisions to function and adjudicate

cases.

3. The imposition of the penalty, summing up to fifty-six years and eight days of imprisonment, was deemed proper, clarifying that the three-fold rule pertains to the service of sentences and not their imposition.

4. No variance was found between the offense charged and that proved, as evidence demonstrated Mejorada's bad faith and direct role in causing undue injury to the government and the complainants.

5. The Supreme Court affirmed the Sandiganbayan's findings and legal conclusions, dismissing Mejorada's petition for lack of merit.

****Doctrine:**** This case reaffirms the definition and scope of corrupt practices of public officers under Section 3(e) of Republic Act No. 3019, emphasizing that any public officer, regardless of their specific role in granting licenses or permits, who causes undue injury to any party or confers unwarranted benefits through bad faith, manifest partiality, or gross inexcusable negligence, is liable under this section.

****Class Notes:****

- ****Republic Act No. 3019, Section 3(e):**** Identifies corrupt practices, including causing undue injury or conferring unwarranted benefits through partiality, bad faith, or negligence.
- ****Public Officer's Liability:**** A public officer's duty does not need to involve granting licenses or permits to be liable under Section 3(e) of Republic Act No. 3019.
- ****Sandiganbayan Jurisdiction:**** The Sandiganbayan's authority to function and adjudicate cases is established, even with divisions comprising three justices each.
- ****Penalties and the Three-Fold Rule:**** The application of Article 70 of the Revised Penal Code pertains to the service of sentences, allowing the imposition of multiple sentences for distinct offenses, with the limitation on service not exceeding forty years.
- ****Historical Context:**** This case provides insight into the judicial process related to corruption charges against public officials in the Philippines and the legal mechanisms employed to uphold integrity within public services.