

**\*\*Title:\*\*** \*Hannah Eunice D. Serana vs. Sandiganbayan and People of the Philippines\*

**\*\*Facts:\*\*** Hannah Eunice D. Serana, a senior University of the Philippines-Cebu student and appointed student regent by President Estrada, was indicted alongside her brother Jade Ian D. Serana for estafa. This indictment was rooted in the alleged misappropriation of PHP 15 million intended for the renovation of Vinzons Hall Annex at UP Diliman. The funding, claimed to be from the Office of the President, was purportedly solicited by Serana under the pretense of renovating the said facility and renaming it as the “President Joseph Ejercito Estrada Student Hall.” Despite funds being released and encashed, the renovation never commenced. Following a complaint lodged by the succeeding student regent and the Secretary General of KASAMA sa UP, the Ombudsman found probable cause for estafa against the Seranas, leading to Criminal Case No. 27819 at the Sandiganbayan. Serana then filed a motion to quash the information, arguing the Sandiganbayan’s lack of jurisdiction over the offense and over her person, given her status as a student and not a salaried public officer. The motion was denied, as was her subsequent motion for reconsideration, prompting her to elevate the case to the Supreme Court.

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

1. Whether the Sandiganbayan has jurisdiction over estafa charges against a student regent.
2. Whether a student regent qualifies as a public officer within the scope of the Sandiganbayan’s jurisdiction.
3. Whether the offense was committed in relation to the office of a student regent.
4. Whether the source of the disputed funds exempts the petitioner from Sandiganbayan’s jurisdiction.

**\*\*Court’s Decision:\*\***

The Supreme Court held that the petition lacks merit and dismissed it. It clarified that the jurisdiction of the Sandiganbayan is determined by P.D. No. 1606, as amended, not by R.A. No. 3019. The court ruled that the Sandiganbayan has jurisdiction over estafa committed by public officials in relation to their office, including cases where other felonies are involved. Furthermore, it held that the position of a UP student regent does qualify as a public officer because it involves an investment with some portion of the sovereign functions of the government, despite the lack of salary or traditional compensation. The court also determined that the allegations in the information sufficiently indicated that the offense was committed in relation to Serana’s official functions as a student regent. Lastly, the court noted that the source of the funds, whether from the government or from President Estrada personally, is a matter of defense that should be tackled during the trial and not a basis to

challenge jurisdiction.

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

The ruling reiterated the doctrine that the Sandiganbayan has jurisdiction over public officers for offenses committed in relation to their office, including other felonies such as estafa. This jurisdiction extends to officers of government-owned or controlled corporations, state universities, or educational institutions classified under the amended P.D. No. 1606, Section 4. Compensation is not an essential element for defining a public officer.

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

- **\*\*Jurisdiction of the Sandiganbayan:\*\*** Covers officials classified as Grade “27” and higher, and other specific officials as enumerated, over crimes committed in relation to the office.
- **\*\*Public Officer Definition:\*\*** Includes individuals performing sovereign functions of the government, with or without salary.
- **\*\*Relevant Statutes:\*\*** P.D. No. 1606 as amended defines the jurisdiction of the Sandiganbayan; R.A. No. 3019 relates to anti-graft and corrupt practices but does not define Sandiganbayan’s jurisdiction.
- **\*\*Legal Strategy:\*\*** Arguments regarding the source of funds and the nature of the official’s role should be considered as defenses during trial, not as pre-trial arguments for jurisdiction.

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

The creation and amendments of the Presidential Decrees and Republic Acts regarding the jurisdiction of the Sandiganbayan reflect the evolving legal framework in the Philippines aimed at combating corruption and holding public officials to account. The case of Hannah Eunice D. Serana challenges the application of these laws to student regents, highlighting the broad interpretation of “public officer” to include unpaid positions of authority in state universities, thereby expanding the jurisdictional reach of the Sandiganbayan.