

****Title:**** Corpuz & Roman vs. Sandiganbayan and People of the Philippines: A Study on Delay and the Right to Speedy Disposition in Criminal Cases

****Facts:****

Maria C. Corpuz and Antonio H. Roman, Sr., executives of FILSYN Corporation, faced charges under the Anti-Graft and Corrupt Practices Act due to their involvement in a “tax credit scam.” The Office of the Ombudsman, after concluding its investigation, filed 61 Informations against various individuals including Corpuz and Roman. These cases were raffled to the Sandiganbayan’s Fourth Division.

Subsequent motions for reconsideration or reinvestigation were filed by the accused, including Corpuz and Roman, which led to the Sandiganbayan granting a 60-day period for the prosecution’s reinvestigation. However, this period, as well as several extensions, lapsed without resolution from the prosecution. This led to a verbal dismissal order from Justice Narciso S. Nario, which was contested and eventually led to the constitution of a Special Division by the Sandiganbayan. This division set aside the order of dismissal, a resolution supported by a majority but not unanimously. Motions for reconsideration filed by the accused, including Corpuz and Roman, were denied.

Corpuz and Roman then filed a petition for certiorari and mandamus with the Supreme Court, asserting that the Sandiganbayan committed grave abuse of discretion. The Supreme Court, however, denied the petition, affirming the Sandiganbayan’s resolutions and emphasizing the procedural and substantive aspects regarding the delays in the prosecution and the dismissal of the cases.

****Issues:****

1. Whether the Sandiganbayan committed grave abuse of discretion amounting to lack or excess of jurisdiction in denying the petitioners’ motions for reconsideration and in voiding the verbal order of dismissal.
2. Whether the right of the accused to a speedy trial and disposition was violated due to the prosecution’s delay.
3. The validity of a verbal order of dismissal in criminal cases.

****Court’s Decision:****

The Supreme Court denied the petition, ruling that:

1. ****Grave Abuse of Discretion:**** There was no grave abuse of discretion by the Sandiganbayan as it followed legal procedures in handling the petitioners’ motions and in

requiring a written order for the dismissal of the cases.

2. **Right to Speedy Trial and Disposition:** While acknowledging the accused's right to a speedy disposition, the Court noted that the delays were partly due to the actions of the defendants themselves, such as filing motions for reconsideration or reinvestigation.

3. **Verbal Order of Dismissal:** A verbal order of dismissal does not comply with the mandates for a judgment or final order to be written, personally prepared, signed by the judge, and to state the facts and the law upon which it is based, rendering Justice Nario's verbal dismissal ineffective.

Doctrine:

- The right to a speedy trial and disposition of cases is relative and flexible, not absolute, and must be balanced against societal interests and the rights of the accused.
- A judgment or final order must be written, signed by the judge, and contain a clear statement of facts and the law upon which it is based.

Class Notes:

- **Speedy Trial and Disposition:** The right to a speedy trial and disposition is protected under the Constitution but is subject to reasonable delays and does not preclude the state from reasonably extending prosecutorial efforts.
- **Judicial Orders:** Orders, especially those leading to the dismissal of cases, must be in writing, detailed with factual and legal bases, and properly signed by the presiding judge.
- **Grave Abuse of Discretion:** This principle is applied narrowly, focusing on instances where a court acts without jurisdiction, exceeds its jurisdiction, or where its actions could be seen as arbitrary or capricious.
- **Mandamus:** A writ of mandamus cannot compel acts that are not clearly mandated or those involving judicial or quasi-judicial discretion unless there's a grave abuse of discretion.

Historical Background:

This case reflects the complexities within the Philippine judicial system, particularly in handling corruption charges involving public officials and private individuals. It exemplifies the challenges in balancing the rights to speedy trial and disposition with the need for thorough investigation and prosecution, especially in cases with significant societal interests.