

Title:

Jejomar C. Binay vs. Hon. Sandiganbayan and The Department of Interior and Local Government, et al.

Facts:

The consolidated petitions involve the jurisdiction of the Sandiganbayan over criminal cases concerning municipal mayors charged with violations under Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act) and Article 220 of the Revised Penal Code.

The essence of the contention revolves around whether or not the Sandiganbayan retains exclusive jurisdiction over such cases in light of the enactments of Republic Act Nos. 7975 and 8249, which sought to redefine the jurisdictional boundaries of the Sandiganbayan.

Procedural Posture:

- G.R. Nos. 120681-83:** Petitioner Jejomar Binay sought to annul the Sandiganbayan's resolutions denying his motion to refer Criminal Cases Nos. 21001, 21005, and 21007 to the RTC of Makati, post-enactment of R.A. No. 7975.
- G.R. No. 128136:** Petitioners led by Mario C. Magsaysay challenged the Sandiganbayan's resolution reversing its prior decision, which deferred the proceedings in Criminal Case No. 23278 in anticipation of the Supreme Court's ruling on the Binay cases.

Throughout the procedural journey, numerous motions were filed, including motions to quash the informations, suspend proceedings, and motions invoking issues of jurisdiction, due process, and alleged violations of the right to speedy disposition of cases.

Issues:

- Whether the Sandiganbayan, under R.A. Nos. 7975 and 8249, exercises exclusive original jurisdiction over criminal cases involving municipal mayors accused of violations of R.A. No. 3019 and Article 220 of the Revised Penal Code.
- If jurisdiction resides with the Sandiganbayan, whether the proceedings violated the petitioners' right to a speedy disposition of their cases.

Court's Decision:

- Jurisdiction:** The Supreme Court held that the Sandiganbayan retains exclusive original jurisdiction over the criminal cases in question. This determination was grounded on the interpretation of R.A. Nos. 7975 and 8249, which articulate the jurisdiction of the Sandiganbayan, including offenses committed by municipal mayors - classified as grade "27" and higher.

2. ****Speedy Disposition:**** The Court found no violation of the right to speedy disposition in Binay's case, considering the complexity of the issues and the procedural actions taken during the pre-trial phase.

Doctrine:

The exclusive original jurisdiction of the Sandiganbayan extends to criminal cases involving officials occupying positions of grade "27" and higher, including municipal mayors, under the amendments introduced by R.A. Nos. 7975 and 8249. Jurisdiction is determined by law, not by consent, agreement, or estoppel.

Class Notes:

- The jurisdiction of the Sandiganbayan is delineated by statutory provisions, with specific reference to salary grade classifications as a determinant factor.
- The principle that jurisdiction over a case is determined by law, rather than by consent or estoppel, was reiterated.
- The right to speedy disposition of cases is evaluated based on a balancing test considering the conduct of both the prosecution and the defense, the length and reasons for delay, and the potential prejudice to the defendant.

Historical Background:

The jurisdiction of the Sandiganbayan, established to adjudicate cases involving corrupt practices of public officers, has evolved through legislative amendments aimed at refining and specifying its scope amidst the complexities of public administration and legal proceedings against officials accused of corruption.