

Title:

Alejandro G. Macadandang vs. Hon. Sandiganbayan (Third Division) and People of the Philippines

Facts:

Alejandro G. Macadandang, the budget officer for the Bureau of Posts in La Union, along with five other postal officials, an auditing examiner and property inspector of the Provincial Auditor's Office, and three private persons were charged with estafa through falsification of public documents in four identical cases varying in amounts, vehicles, and private persons involved. These charges stemmed from the loss of P26,523.00, resulting from falsified vouchers for non-existent repairs of postal vehicles. The accused pleaded "Not Guilty," and the Sandiganbayan granted separate trials for Macadandang and two others after the prosecution's presentation.

The scheme involved the falsification of bids and vouchers, claiming repairs were made and expenses incurred when, in reality, the repairs never happened. The processing involved several steps from requisition to approval by the director based on canvas and inspection reports. Treasury Warrants were issued for the spurious repair expenses. The vouchers and supporting documents were later found to be spurious. The Sandiganbayan convicted the government officers involved but acquitted the private individuals due to a lack of evidence of their participation. Macadandang and one other filed for reconsideration which was initially denied, leading to this petition.

Issues:

1. Whether there was sufficient evidence to show Macadandang's participation in and criminal conspiracy to commit estafa through falsification of public documents.
2. Whether Macadandang, as budget officer, had the duty or authority to verify the veracity of the transactions detailed in the vouchers and supporting documents.
3. Whether Macadandang's actions were merely ministerial in signing the documents presented to him.

Court's Decision:

The Supreme Court, upon reconsideration, granted Macadandang's motion, acquitting him of the charges primarily on the ground of reasonable doubt. The court found that while Macadandang's involvement was limited to signing the vouchers as part of his official duties, there was insufficient evidence to demonstrate his participation in the conspiracy to defraud the government. The Court emphasized that the culpability for participating in a

conspiracy requires positive evidence, which was lacking in this case.

Doctrine:

The decision reiterates the principle that conspiracy must be established by positive and conclusive evidence and that each participant's guilty knowledge and deliberate participation must be proven beyond reasonable doubt. Furthermore, it highlights that mere signature on official documents does not automatically imply complicity in a fraudulent scheme unless there is clear evidence of wrongdoing.

Class Notes:

- Conspiracy requires clear and convincing evidence of each conspirator's participation.
- Signing official documents as part of one's duties without evidence of wrongful intent or knowledge of a fraudulent scheme does not constitute conspiracy.
- Acquittal based on reasonable doubt reaffirms the presumption of innocence.
- The principle of separability of trials allows for individual evaluation of each accused's actions and culpability.

Historical Background:

This case sheds light on the procedures involved in government transactions and the vulnerabilities to fraud. It underscores the importance of checks and balances within governmental operations and the rigorous standards required for the criminal prosecution of public officials.