

### Title:

**\*\*People of the Philippines vs. Aristeo E. Atienza, Rodrigo D. Manongsong, Crispin M. Egarque, and The Hon. Sandiganbayan (Third Division)\*\***

### Facts:

In June 19, 2001, an Information was filed charging Aristeo E. Atienza (Mayor of Puerto Galera), Rodrigo D. Manongsong (Municipal Engineer), and Crispin M. Egarque (Police Officer) with violation of Section 3(e) of RA 3019 (Anti-Graft and Corrupt Practices Act) for the demolition of a fence belonging to Hondura Beach Resort owned by Edmundo A. Evora on July 4, 2000, and subsequent dates in Puerto Galera, Oriental Mindoro. After pleading not guilty, a series of court proceedings followed, including the presentation of prosecution witnesses who testified on the circumstances surrounding the demolition of the fence, which they attributed to the orders of Mayor Atienza carried out by Manongsong and Egarque. Following the presentation of evidence, the accused filed a Demurrer to Evidence, arguing the insufficiency of prosecution's evidence. The Sandiganbayan granted this demurrer on February 28, 2006, effectively dismissing the case due to a lack of evidence proving guilt beyond reasonable doubt, particularly concerning the defendants' alleged manifest partiality or evident bad faith.

### Issues:

1. Whether the Sandiganbayan denied the prosecution due process by resolving issues not raised in the Demurrer to Evidence without giving the prosecution an opportunity for a hearing.
2. Whether the Sandiganbayan erred in its conclusion that the prosecution failed to sufficiently establish the elements of the crime charged, especially the manifest partiality or evident bad faith of the respondents.

### Court's Decision:

The Supreme Court affirmed the Sandiganbayan's resolution dismissing the case, finding no grave abuse of discretion. It held that the prosecution was not denied due process as it had ample opportunity to present its case and participate in the proceedings. Moreover, the Court agreed with the Sandiganbayan's finding that the second element of the offense under Section 3(e) of RA 3019 (manifest partiality, evident bad faith, or gross inexcusable negligence) was not established by the evidence presented by the prosecution. The dismissal of the case on demurrer to evidence was tantamount to an acquittal, thus barring any appeal under the rule against double jeopardy.

### Doctrine:

This case reiterates the doctrine that the granting of a Demurrer to Evidence in criminal cases operates as an acquittal that cannot be appealed without placing the accused in double jeopardy. It also highlights the standards for proving the elements of corruption under Section 3(e) of RA 3019, namely, the need to demonstrate manifest partiality, evident bad faith, or gross inexcusable negligence by clear evidence.

### Class Notes:

- **\*\*Demurrer to Evidence:\*\*** A motion to dismiss a case filed by the defense after the prosecution has rested its case, on the grounds of insufficiency of evidence.
- **\*\*Double Jeopardy:\*\*** Prohibits the prosecution of an accused person more than once for the same offense, especially after acquittal.
- **\*\*Section 3(e) of RA 3019:\*\*** Defines corrupt practices of any public officer, including causing undue injury by manifest partiality, evident bad faith, or gross inexcusable negligence.
- Essential Elements of Violation under Section 3(e) of RA 3019:
  1. The offender is a public officer.
  2. Acted with manifest partiality, evident bad faith, or gross inexcusable negligence.
  3. Caused undue injury or provided unwarranted benefits, advantage, or preference in the discharge of official functions.

### Historical Background:

The filing of this case stems from the broader context of corruption in public office and the Philippine government's ongoing efforts to combat graft and corrupt practices. RA 3019, or the Anti-Graft and Corrupt Practices Act, is a key piece of legislation intended to promote integrity and accountability among public officials. This case illustrates the challenges in proving corruption charges, particularly the requirement to demonstrate the accused's malicious intent or gross negligence in causing undue harm or providing undue advantages under Section 3(e) of the Act.