

Title:

People of the Philippines vs. Richard R. Enojo: A Case of Public Office Misconduct

Facts:

The case revolves around Atty. Richard R. Enojo, the Officer-In-Charge Provincial Legal Officer/Provincial Administrator of Negros Oriental, charged under Section 3(a) of Republic Act No. 3019, the “Anti-Graft and Corrupt Practices Act”. The case was initiated with an Information dated December 27, 2017, for actions on February 7, 2013, persuading the Philippine National Police (PNP)-Dauin Station to summon individuals concerning a land dispute, an act beyond PNP’s mandate as per Section 24 of Republic No. 6975 (the Department of the Interior and Local Government Act of 1990).

The Sandiganbayan’s trial revealed that Enojo objected to a Fencing Permit applied for by Dauin Point Land Corporation (DPLC) through Ralph Gavin Hughes, asserting ownership over part of the contested lot as payment for legal services. Enojo’s requests to the police to summon the involved parties for a conference led to administrative complaints filed against him for violations of RA 3019. The Ombudsman found probable cause for violation of Section 3(a), leading to the accusation in the Sandiganbayan on February 9, 2018.

Issues:

The Supreme Court focused on whether Enojo was guilty beyond reasonable doubt of violating Section 3(a) of RA 3019, involving:

1. Whether Enojo’s actions constituted persuading, inducing, or influencing another public officer (SPO4 Briones of the Dauin Police) to perform acts beyond statutory powers and functions.

Court’s Decision:

The Supreme Court granted Enojo’s appeal, reversing the Sandiganbayan’s decision. The Court determined that while Enojo was a public officer who attempted to involve police in a civil matter, the element of persuading, inducing, or influencing a public officer to commit an act violating rules or regulations, or in connection with official duties, was not conclusively established. The Court underscored that the second element (persuading, inducing, or influencing another public officer) was absent, with SPO4 Briones acting on standard procedure rather than under undue influence from Enojo.

Doctrine:

This case reiterates the doctrine that for conviction under Section 3(a) of RA 3019, it must

be established beyond reasonable doubt that the accused, a public officer, persuaded, induced, or influenced another public officer to perform acts constituting violations of rules and regulations duly promulgated by competent authority. Furthermore, the intent and actual act of persuasion, inducement, or influence must be proven as part of the illegal act.

Class Notes:

- ****Elements of Violation under Section 3(a) of RA 3019****: (1) Offender is a public officer, (2) persuades, induces, or influences another public officer to perform an act, or allows himself to be persuaded, induced, or influenced, (3) the act constitutes a violation of rules, regulations, or an offense connected to official duties.
- ****Proof of Persuasion, Inducement, or Influence****: Mere acquiescence to standard procedures, without proof of undue influence, persuasion, or inducement, does not suffice to meet the elements of the crime under Section 3(a) of RA 3019.

Historical Background:

This decision touches upon the broader context of the responsibilities of public officials under the Anti-Graft and Corrupt Practices Act in the Philippines, emphasizing the judiciary's role in scrutinizing actions potentially exploiting official functions for personal ends. The intricate balance between law enforcement assistance and the usurpation of their statutory functions by public officers through undue influence is highlighted, showcasing the importance of clear demarcations of public office limits within legal frameworks.