

****Title:** Commo. Lamberto R. Torres (Ret.) vs. Sandiganbayan (First Division) and People of the Philippines**

****Facts:****

From 1991 to 1993, Commo. Lamberto R. Torres served as the Assistant Chief of the Naval Staff for Logistics in the Philippine Navy. A special audit by the Commission on Audit (COA) highlighted alleged overpricings in drug and medicine procurements. This led to a preliminary investigation by the Ombudsman in 1996 against Torres and others, which was eventually dismissed in 1999.

Years later, after Torres' retirement in 2001, a new investigation was recommended in 2004 by the Ombudsman, based on the same COA report but concerning other transactions. Torres, unaware of this due to notices being sent to an old address, discovered eight Informations filed against him in 2014, related to emergency purchases of overpriced medicines. Arguing his right to speedy trial and due process were violated by the 18-year investigation delay, Torres sought to quash these Informations at the Sandiganbayan, which denied his motions, leading to his petition before the Supreme Court.

****Issues:****

The central legal issue concerns whether the Sandiganbayan committed grave abuse of discretion by denying Torres' Motion to Quash, based on the violation of his right to a speedy disposition of cases.

****Court's Decision:****

The Supreme Court granted Torres' petition, annulling and setting aside the Sandiganbayan's Resolutions and ordering the dismissal of the Criminal Case Nos. SB-11-CRM-0423 to 0433 for violating Torres' constitutional right to a speedy disposition of cases. The Court found the 18-year delay in the investigation and prosecution process to be vexatious, capricious, and oppressive, thus violating Torres' rights.

****Doctrine:****

The case reaffirmed the doctrine regarding the right to a speedy disposition of cases, which mandates that such a right is deemed violated only when the proceedings are attended by vexatious, capricious, and oppressive delays, or when unjustified postponements are secured without cause or justifiable motive for a long period.

****Class Notes:****

1. ****Right to Speedy Disposition of Cases:**** Section 16, Article III of the 1987 Philippine

Constitution guarantees this right, applying to all judicial, quasi-judicial, or administrative bodies. Factors to consider in determining a violation include the length of the delay, the reasons for the delay, the defense's assertion of their right, and the prejudice caused by the delay.

2. ****Grave Abuse of Discretion:**** Defined as a whimsical, arbitrary, or capricious act that evades a positive duty or refuses to perform an act as contemplated by law.
3. ****Motion to Quash:**** A legal procedure used to challenge the validity of a prosecution or indictment, here based on procedural delays infringing upon constitutional rights.

****Historical Background:****

The case underscores the imperative for expediency and fairness in legal proceedings within the Philippine judicial system. It illustrates the challenges posed by prolonged investigations and the significance of safeguarding an individual's constitutional rights against procedural abuses, emphasizing the judiciary's role in upholding justice and preventing undue delays that could undermine the credibility of legal institutions and the essence of fair trial rights.