

Title

Roberto P. Fuentes vs. People of the Philippines, G.R. No. 808 Phil. 586

Facts

* **Background:**

* **Accused:** Roberto P. Fuentes, Municipal Mayor of Isabel, Leyte

* **Complainant:** Fe N. Valenzuela, sole proprietor of Triple A Ship Chandling and General Maritime Services (Triple A)

* **Event Date:** Alleged offense occurred around January 8, 2002

* **Incident:**

* **1993 - 2001:** Valenzuela's Triple A operates with business permits.

* **Early 2002:** Fuentes refuses to sign Triple A's Business Permit despite Valenzuela's compliance with renewal requirements.

* **Temporary Operations:** Triple A secures temporary permits but is shut down by BOC upon Fuentes's memo alleging smuggling and drug trading.

* **Attempts for Appeal:** Valenzuela secures clearances from various agencies, proving no derogatory records.

* **Result:** Fuentes still denies the Business Permit, leading to Triple A's suspension in operations from 2002-2006.

* **Fuentes's Defense:**

* **Basis for Non-Issuance:** Rumors of Valenzuela's illegal activities and written reports supporting these claims in 2002.

* **Testimonies:** Presented witnesses refuting Valenzuela's claim of permit denial and accusing her of pulling the application.

* **Issuance of Permits:** Fuentes noted other businesses were issued permits, including other ship chandlers and Valenzuela's other business, Gemini Security.

* **Prosecution:**

* Valenzuela was targeted, causing undue injury by denying business operations.

* **Procedural History:**

* **September 15, 2006:** Fuentes pleads not guilty.

* **September 30, 2008:** Sandiganbayan convicts Fuentes, sentencing him to 6 years and 1 month to 10 years and 6 months of imprisonment, with perpetual disqualification from public office and a P200,000 nominal damage award to Valenzuela.

* **February 16, 2009:** Sandiganbayan denies Fuentes's motion for reconsideration.

* **Petition:** Fuentes appeals to the Supreme Court.

Issues

1. * **Primary Legal Issue:** Whether the Sandiganbayan correctly convicted Fuentes of violating Section 3(e) of RA 3019.

Court's Decision

* **Conviction Affirmed:**

* **Elements of Section 3(e) Violation:**

* **Accused as a Public Officer:** Confirmed as Municipal Mayor.

* **Manifest Partiality and Bad Faith:**

* **Partiality:** Targeted refusal against Valenzuela's Triple A, while issuing permits to other ship chandlers.

* **Bad Faith:** Ignoring clearances exculpating Valenzuela and failing to act in previous years despite long-existing rumors.

* **Undue Injury:**

* Fuentes's refusal caused operational suspension of Triple A from 2002-2006.

* **Penalties:**

* **Imprisonment:** 6 years and 1 month to 10 years and 6 months.

* **Perpetual Disqualification:** From public office.

* **Damages:** Modified from P200,000 nominal to P300,000 temperate damages due to pecuniary loss, plus 6% legal interest per annum from finality until fully paid.

Doctrine

The case reaffirms that public officials must act without partiality or bad faith, and the denial of any permit must be based on legitimate, legally compliant grounds. The successful demonstration of manifest partiality or evident bad faith along with undue injury arising from such acts can lead to a conviction under Section 3(e) of RA 3019.

Class Notes

* **Key Elements:**

1. * **Public Officer:** The accused must be a public officer in administrative/judicial functions.

2. * **Manifest Partiality/Bad Faith or Negligence:** Must show clear bias or dishonest purpose.

3. * **Undue Injury or Unwarranted Benefit:** Actions must cause undue injury or grant

unwarranted benefit.

* **Statutes Applied:**

* RA 3019, Section 3(e)

* Local Government Code Sections 16 and 444(b)(3)(iv)

* Civil Code Articles 2221 and 2224

Historical Background

This case is set against the broader fight against graft and corruption in the Philippines, highlighting the “Anti-Graft and Corrupt Practices Act.” The decision underscores the judiciary’s commitment to uphold the integrity of public office and the fair treatment of business entities against unjust governmental actions. The case serves as a precedent on the consequences of abuses of power by public officials, ensuring due process and impartiality in administrative functions.