

Title: Amando A. Inocentes vs. People of the Philippines, et al.

Facts:

In October 2001, Amando Inocentes and four others, all public officers of the Government Service Insurance System (GSIS) Tarlac City Field Office, were charged with violating Section 3(e) of Republic Act (RA) No. 3019. The charges stemmed from the unlawful processing and approving of housing loans under the GSIS Bahay Ko Program for unqualified borrowers with a total loan amount of Php241,053,600. Additionally, they approved loans for commercial purposes amounting to Php52,107,000, resulting in an over-appraisal of collaterals by Php33,242,848.36, thus causing harm to the government.

The Sandiganbayan found probable cause on May 10, 2012, and issued arrest warrants. To avoid arrest, Inocentes posted bail. On July 10, 2012, Inocentes filed an omnibus motion contesting the informations, the probable cause, the Sandiganbayan's jurisdiction, and claimed violation of his right to a speedy trial. The Sandiganbayan denied the motion. Inocentes sought reconsideration, which was also denied, asserting lack of probable cause and a speedy trial violation, backed by an affidavit suggesting political persecution within the GSIS.

Inocentes then filed a petition under Rule 65 with the Supreme Court, alleging grave abuse of discretion by the Sandiganbayan on several grounds. The respondents, including the Ombudsman and the Office of the Solicitor General, argued that the Sandiganbayan's findings of probable cause were valid and Inocentes' due process rights weren't violated.

Issues:

1. Whether the Sandiganbayan committed grave abuse of discretion in denying Inocentes' motion to quash the information.
2. Whether the Sandiganbayan had jurisdiction over Inocentes given his salary grade.
3. Whether the Sandiganbayan erred in its finding of probable cause to issue a warrant of arrest.
4. Whether Inocentes' right to a speedy disposition of cases was violated due to the seven-year delay before the filing of information.

Court's Decision:

1. ****Motion to Quash and Information Validity****:

- The court ruled that the information filed was sufficient, even without detailed acts of each conspirator, as conspiracy can merely be a mode of committing another crime, not requiring

particularities.

- The Sandiganbayan had jurisdiction as the position held by Inocentes (GSIS Branch Manager) falls within its ambit irrespective of the salary grade.

2. **Jurisdiction**:

- The Court upheld the Sandiganbayan's jurisdiction over Inocentes as he was a manager of a government corporation, consistent with established jurisprudence.

3. **Probable Cause**:

- While the Sandiganbayan's finding of probable cause was contested, the Supreme Court found that questioning probable cause after posting bail renders the challenge moot since Inocentes voluntarily submitted to the court's jurisdiction.

4. **Violation of Right to Speedy Disposition**:

- The Court found an inordinate delay by the Ombudsman in resolving the case, taking nearly six years from withdrawing initial information in RTC Tarlac until filing it in the Sandiganbayan. Such delay was deemed unreasonable and violative of Inocentes' right to a speedy disposition of cases.

Doctrine:

- **Conspiracy**: As a mode of commission, it doesn't need detailed allegations. It holds all conspirators equally liable.

- **Jurisdiction**: For Sandiganbayan jurisdiction, the managerial position in a GOCC, not just salary grade, is crucial.

- **Rights**: The constitutional right to speedy disposition of cases extends beyond criminal proceedings to all judicial, quasi-judicial, and administrative processes.

Class Notes:

- **Elements of Violation of RA 3019 Section 3(e)**: Accused must be a public officer; act with partiality, bad faith, or gross negligence; and cause unwarranted benefit or injury.

- **Jurisdiction of Sandiganbayan**: Not limited by salary grade but by position per P.D. 1606 and amending laws.

- **Constitutional Rights**: Section 16, Article III emphasizes a speedy resolution applicable to all types of cases.

Historical Background:

- The case highlights systemic delays within the Philippines' judicial and quasi-judicial processes and the interplay between administrative actions and individual constitutional

rights. The context of the GSIS program for housing loans during early 2000s underscores governmental efforts in housing which, however, became prone to abuses and irregularities.