

Title: Jose C. Luciano vs. Maximo Estrella and Others, G.R. No. L-28467

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****Facts:****

- On July 26, 1967, public officials of Makati, Rizal, including Mayor Maximo Estrella, councilors, the municipal treasurer, and others, conspired with Jose Gutierrez and Franco A. Gutierrez of JEP Enterprises in a transaction involving the delivery of traffic deflectors.
- The contract was found grossly disadvantageous to the Municipality, with 34 out of 59 units delivered and paid at P1,426.50 each, totaling P48,841.00.
- On January 18, 1969, Estrella and others were charged with violating the Anti-Graft and Corrupt Practices Act.
- On May 17, 1969, the Court of First Instance convicted Estrella and several co-defendants, sentencing them to six years in prison and perpetual disqualification from holding public office.
- The convicted officials appealed to the Court of Appeals (CA-G.R. No. 10250-CR) and later filed a motion for a new trial based on newly discovered evidence - financial overdrafts and lack of funds certification by the municipal treasurer.
- The Court of Appeals granted a new trial and remanded the records to the lower court.
- Jose C. Luciano, acting as Mayor of Makati during Estrella's suspension, sought to prevent Estrella's reinstatement and challenged the Court of Appeals' decision through a petition for quo warranto, certiorari, prohibition, and injunction.

****Procedural Posture:****

- Estrella and others convicted by the Court of First Instance of Rizal.
- Appeal filed to the Court of Appeals.
- Motion for new trial granted by the Court of Appeals.
- Luciano filed a petition in the Supreme Court to seek remedies against the decisions of the Court of Appeals.

****Issues:****

1. Whether the grant of a new trial by the Court of Appeals was valid based on newly discovered evidence.
2. Whether Jose C. Luciano had standing to file the petition before the Supreme Court.

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

- ****Grant of New Trial:**** The Supreme Court held that the grant of a new trial by the Court

of Appeals was improper. The alleged new evidence was not considered newly discovered for purposes of warranting a new trial because:

- The information regarding the financial condition of Makati was available to the municipal and provincial officials before the trial.
- The alleged new evidence (municipal financial overdrafts and lack of funds certification) would not change the essential finding of gross disadvantageousness under Republic Act No. 3019.
- The Court of Appeals failed to consider the new evidence jointly with the evidence already on record.

- **Standing of Luciano:** The Court declined to render a specific ruling on Luciano's standing as the Solicitor General had answered the petition supporting Luciano's position. The Solicitor General's petition was considered sufficient to challenge the Court of Appeals' decision.

Doctrine:

- **Newly Discovered Evidence:** To warrant a new trial, the evidence must be such that it could not have been discovered and produced at the trial with reasonable diligence, and it must be of such a nature as to probably change the judgment.
- **Anti-Graft and Corrupt Practices Act:** Republic Act No. 3019 can be violated irrespective of the technical validity of the contract if it is grossly disadvantageous to the government. The intent is to repress both inherently corrupt acts and those that lead to corruption.

Class Notes:

- **Elements for Grant of New Trial:**
 1. Newly discovered evidence.
 2. Could not have been discovered with reasonable diligence.
 3. Likely to change the result of the case.
- **Corrupt Practices under Republic Act No. 3019:**
 - Gross disadvantage to the government suffices for conviction.
 - Validity of the contract is immaterial if disadvantageousness is established.
 - Malum prohibitum nature - the act itself constitutes the violation regardless of intent.
- **Procedural Rule Application:**
 - Rule 124, Sec. 13 (motion for new trial in criminal cases).
 - Rule 121, Sec. 2(b) and Rule 53 (weighted consideration of old and new evidence).

****Historical Background:****

- The case reflects stringent measures against graft and corruption instituted in the Philippines during the 1960s, driven by Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act).
- The decision underscores judicial diligence in handling appeals and new trials to prevent abuse of judicial processes in reinstating convicted public officials.