

Title

Datu Guimid P. Matalam vs. The Second Division of the Sandiganbayan and the People of the Philippines

Facts

- **January 1998 – June 1999:** Alleged illegal and unjustifiable refusal by Datu Guimid P. Matalam and others to pay monetary claims to certain Department of Agrarian Reform (DAR) employees.
- **14 August 2002:** Matalam files a Motion for Reinvestigation.
- **Reinvestigation Outcome:** Public prosecutor files a “Manifestation and Motion to Admit Amended Information,” deleting other accused except Matalam.
- **Original Information:** Charges included refusal to pay backwages due to illegally terminated employees.
- **Amended Information:** Changes focus to Matalam’s alleged illegal dismissal of these DAR employees.
- **12 January 2004:** Sandiganbayan admits Amended Information; Matalam files a Motion to Dismiss and Opposition.
- **11 February 2004:** Matalam files Motion for Reconsideration, which is denied on 3 November 2004.
- **Petition for Certiorari:** Matalam argues resolutions admitting Amended Information without another preliminary investigation denied him due process. Matalam insists that the amended charge is an entirely different offense requiring a new preliminary investigation.

Issues

1. **Whether the amendment of the Information from refusal to pay backwages to illegal dismissal constituted a substantial amendment requiring a new preliminary investigation.**
2. **Whether the Sandiganbayan acted with grave abuse of discretion by admitting the Amended Information without another preliminary investigation.**
3. **Whether Matalam was denied the opportunity to present evidence regarding the lack of manifest partiality, evident bad faith, or gross inexcusable negligence concerning the alleged illegal dismissal.**

Court’s Decision

1. **Substantial Amendment Requiring Preliminary Investigation:**
 - The Court recognized that the amendment altered the facts constituting the offense from refusal to pay backwages to illegal dismissal.
 - As a substantial amendment, it warranted a new preliminary investigation to provide

Matalam an opportunity to challenge the new charges.

2. **Grave Abuse of Discretion by the Sandiganbayan:**

- The Sandiganbayan erred in admitting the Amended Information without conducting another preliminary investigation.
- Although the original and amended charges were related, the Sandiganbayan should have allowed Matalam to defend against the new allegations adequately.
- The refusal denied Matalam due process, as he could not present counter-evidence to the claimed manifest partiality or evident bad faith related to the dismissals.

3. **Right to Present Evidence:**

- The Court emphasized Matalam's right to present specific defenses concerning the new allegations of illegal dismissal.
- A preliminary investigation serves as a critical procedural step to ensure these rights.

Doctrines

1. **Preliminary Investigation:** An accused is entitled to a preliminary investigation for substantial amendments in the information. This right ensures due process is upheld and provides the accused the opportunity to counter new allegations.
2. **Substantial vs. Formal Amendments:** Substantial amendments involve changes in the recital of facts constituting the offense and require renewed investigatory proceedings, unlike formal amendments, which may not substantively alter the defense strategy or cause of action.

Class Notes

1. **Key Concepts:**

- **Preliminary Investigation:** Necessary for substantial amendments in criminal charges.
- **Due Process:** Right of the accused to present a defense and counter-evidence.
- **Evident Bad Faith and Manifest Partiality:** Essential elements in offenses under the Anti-Graft and Corrupt Practices Act (RA 3019).

2. **Statutory Provisions:**

- **Rule 110, Sec. 14, Revised Rules on Criminal Procedure:** Governs amendments to information and when such amendments necessitate preliminary investigations.
- **Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act):** Specific provisions on acts causing undue injury to any party.

Historical Background

- **Context:** The case revolves around alleged corrupt practices during the post-Martial Law period in the Philippines. This period saw numerous cases of graft and corruption, primarily targeting public officials' misconduct.
- **Significance:** Reinforces the procedural rights of accused public officials, especially concerning their right to a thorough and fair preliminary investigation when faced with substantial charges of graft and corrupt practices. The case ultimately underscores the importance of due process to uphold justice and fairness in the legal system, irrespective of the accused's position.