

Title:

Mary Rose A. Boto vs. Senior Assistant City Prosecutor Vincent L. Villena, City Prosecutor Archimedes V. Manabat, and Assistant City Prosecutor Patrick Noel P. De Dios, A.M. No. P-12-3094 (2013)

Facts:

This administrative case originated from a libel information filed against Mary Rose A. Boto in the Metropolitan Trial Court (MeTC) of Taguig City, Branch LXXIV. The information was prepared by Assistant City Prosecutor Patrick Noel P. De Dios, approved by City Prosecutor Archimedes Manabat, and handled by Senior Assistant City Prosecutor Vincent Villena in the trial.

On January 13, 2012, the libel charge against Boto was filed in the MeTC, which promptly issued a warrant for her arrest. Upon posting bail on January 25, 2012, Boto was notified of her arraignment scheduled for February 13, 2012. Prior to the arraignment, Boto filed a motion to quash, arguing that the MeTC lacked jurisdiction over libel cases, which fall under the jurisdiction of the Regional Trial Court (RTC).

The MeTC did not immediately dismiss the case but instead ordered the prosecutor to comment within ten days and reset the arraignment to April 13, 2012. Villena's failure to timely submit a comment led to further delays, with the hearing being reset to June 27, 2012, causing Boto to claim a violation of her right to a speedy trial.

Boto also alleged bias, as her previous libel case against George Tizon (dismissed by Villena without due investigation) contrasted with the rapid action taken on Tizon's subsequent libel complaint against her. Boto received the resolution on her case only after the appeal period had lapsed.

Ultimately, on October 17, 2012, the information was correctly filed with the RTC of Taguig City. Subsequently, Boto filed a complaint against Villena, Manabat, and De Dios for gross ignorance of the law.

Issues:

The primary issues addressed by the Supreme Court were:

1. Whether the prosecutors demonstrated gross ignorance of the law by filing a libel case in an inappropriate court.
2. Whether the prosecutors failed to take appropriate corrective actions promptly.
3. Whether the prosecutors violated Boto's constitutional right to a speedy trial.

Court's Decision:

1. Gross Ignorance of Law and Incorrect Filing:

The Court found that by filing the information in the MeTC, De Dios displayed a lapse of diligence and legal knowledge. Despite his claims of inadvertence, the Court reprimanded him for carelessness in not understanding jurisdictional requirements.

2. Approval and Responsibility:

Manabat, as the approving authority, should have exercised greater diligence given his knowledge of jurisdictional mandates. While he also claimed inadvertence, the Court admonished him to be more careful and circumspect in future approvals.

3. Mismanagement by Villena:

Villena, assigned as the trial prosecutor, was criticized for opposing the motion to quash despite clear jurisdictional issues. His delay in responding to the motion to quash and failure to move for dismissal promptly amounted to gross ignorance of the law. The Court held that Villena should have recognized the basic jurisdictional misstep and acted immediately to rectify it. Consequently, Villena was fined PHP 10,000 for his mishandling of the case.

Doctrine:

1. Jurisdiction Must Be Correctly Determined:

The Supreme Court reemphasized the principle that jurisdiction over libel cases is exclusively vested in the RTC, as per Article 360 of the Revised Penal Code. This is a non-negotiable statutory mandate that should be stringently followed.

2. Prosecutorial Duty Beyond Conviction:

Prosecutors have a duty not only to pursue convictions but also to ensure justice is served, which includes respecting jurisdictional boundaries and protecting constitutional rights such as the right to a speedy trial.

Class Notes:

- Essential elements of jurisdiction in libel cases:
- Governed by Article 360, Revised Penal Code.
- Exclusive jurisdiction in RTC.
- Prosecutor's responsibilities:
- Uphold and apply accurate jurisdictional and procedural rules.
- Promptly act on motions impacting defendants' rights.

- Impact of procedural delays:
- Violations can infringe on the right to a speedy trial.

Historical Background:

This case highlights ongoing issues in prosecutorial practices and jurisdictional adherence within the Philippine judicial system. The case unfolded during an era where internet-related libel cases were becoming more frequent, raising new legal challenges and the need for clarity on handling such cases. This decision by the Supreme Court underscored the importance of strict procedural compliance and the role of prosecutors in ensuring justice beyond mere prosecution.