

Title: Rafael L. Coscolluela, et al. vs. Sandiganbayan and People of the Philippines (2013)

Facts:

1. **Background**:

- Rafael L. Coscolluela served as governor of Negros Occidental for three terms, ending June 30, 2001.
- Edwin N. Nacionales was the Special Projects Division Head, Jose Ma. G. Amugod was Nacionales' subordinate, and Ernesto P. Malvas was the Provincial Health Officer.

2. **Complaint Initiation**:

- On November 9, 2001, People's Graftwatch filed a letter-complaint with the Office of the Ombudsman for Visayas regarding an alleged anomalous purchase of P20,000,000 worth of equipment made just before Coscolluela's term ended.

3. **Investigation Launch**:

- The Ombudsman's Case Building Team conducted an investigation and released a Final Evaluation Report on April 16, 2002, upgrading the complaint to a criminal case.

4. **Findings and Resolution**:

- Petitioners submitted counter-affidavits.
- On March 27, 2003, Graft Investigation Officer Butch E. Cañares issued a resolution finding probable cause against petitioners for violating Section 3(e) of the Anti-Graft and Corrupt Practices Act (RA 3019).
- Deputy Ombudsman for the Visayas Primo C. Miro recommended filing the Information, finally approved by Acting Ombudsman Orlando C. Casimiro on May 21, 2009.

5. **Filing of the Information**:

- The Information was filed with the Sandiganbayan (SB) on June 19, 2009.
- Petitioners claimed they were unaware of the cases until the Information was filed.

6. **Motion to Quash**:

- On July 9, 2009, Coscolluela filed a Motion to Quash on grounds of violation of the right to speedy disposition of cases, later adopted by Nacionales, Malvas, and Amugod.
- Respondents opposed, citing necessary thorough review delays and no raised objections during the period.

Ruling of the Sandiganbayan:

1. **Resolution Denial**:

- On October 6, 2009, SB denied the motion to quash, noting the delay from March 27, 2003, to May 21, 2009, was procedural and not inordinate.

2. **Motions for Reconsideration**:

- Petitioners filed motions on November 6 and 9, 2009, challenging the compartmentalization of the delay period.

- On February 10, 2010, SB denied reconsideration, maintaining the division of time periods.

Issues:

1. **Violation of the Right to Speedy Disposition of Cases**:

- Whether SB committed grave abuse of discretion in ruling that petitioners' right to a speedy disposition was not violated.

Court's Decision:

1. **Length of Delay**:

- The preliminary investigation spanned nearly eight years, from the complaint in November 2001 to approval in May 2009.

2. **Reasons for Delay**:

- Justifications provided by respondents, such as procedural safeguards and review necessity, were deemed insufficient.

3. **Assertion of Right**:

- Petitioners did not and could not assert their right to a speedy resolution earlier as they were unaware of ongoing proceedings.

4. **Prejudice to Petitioners**:

- Protracted proceedings led to anxiety, constraints on liberty, public suspicion, and potential damage to defense preparation.

Doctrine Established:

1. **Right to Speedy Disposition**:

- Article III, Section 16 of the 1987 Philippine Constitution guarantees the right to speedy case disposition before judicial, quasi-judicial, or administrative bodies.

- Speedy disposition is relative, requiring balance of various factors like length and reason for delay, assertion of the right, and resultant prejudice.

2. **Procedural Completion**:

- Preliminary investigations are deemed incomplete without the Ombudsman's final written approval (Section 4, Rule II of Admin Order No. 07).
- Justifiable delays must be supported by extraordinary complications, not procedural review excuses.

Class Notes:

1. **Elements of the Right to Speedy Disposition**:

- Length of Delay.
- Reasons for Delay.
- Assertion of the Right.
- Prejudice Caused by Delay.

2. **Jurisprudence and Statutes**:

- 1987 Philippine Constitution, Article III, Section 16.
- Section 4, Rule II of the Administrative Order No. 07.
- RA 3019, Section 3(e) (Anti-Graft and Corrupt Practices Act).

Historical Background:

This case arose during a period of heightened vigilance against graft and corruption in Philippine governance. The right to the speedy disposition of cases was a critical measure against the languishing of cases in bureaucratic delays, often perceived as obstructing justice. The decision reflects the judiciary's commitment to upholding constitutional guarantees and requiring governmental bodies, like the Ombudsman, to exercise their duties with both care and timeliness.