

Title:

Eduardo A. Alarilla vs. The Honorable Sandiganbayan (First Division)

Facts:

On December 1, 1995, the Office of the Ombudsman, through the Office of the Special Prosecutor, filed two separate criminal informations with the Sandiganbayan against Eduardo A. Alarilla, the Municipal Mayor of Meycauayan, Bulacan:

1. Criminal Case No. 23069 - Grave Threats under Article 282 of the Revised Penal Code
2. Criminal Case No. 23070 - Violation of Section 3(e) of Republic Act No. 3019, Anti-Graft and Corrupt Practices Act.

Criminal Case No. 23070 was raffled to the Second Division of Sandiganbayan and eventually dismissed on jurisdictional grounds—claims were not office-related. Criminal Case No. 23069 was assigned to the First Division. Petitioner Alarilla filed motions for reinvestigation and reconsideration to dismiss this case on similar jurisdictional grounds, but these were denied. An amended information in Criminal Case No. 23069 was admitted stating that Alarilla, during a public hearing, willfully and unlawfully aimed a gun and threatened to kill Simeon Legaspi, a municipal councilor.

After the prosecution presented evidence in Criminal Case No. 23069, the petitioner filed a demurrer to evidence, contending lack of proof for the elements of grave threats and the act being unrelated to his official functions. The Sandiganbayan denied the demurrer and the subsequent motion for reconsideration. Alarilla appealed to the Supreme Court, asserting that the Sandiganbayan gravely abused its discretion in these denials.

Issues:

1. Did the First Division of the Sandiganbayan act with grave abuse of discretion in denying petitioner's demurrer to evidence?
2. Did the Sandiganbayan have jurisdiction over Criminal Case No. 23069 despite the alleged absence of an office-related character of the crime charged?
3. Should the petitioner be granted injunctive relief to halt the proceedings in Criminal Case No. 23069?

Court's Decision:

1. Denial of Demurrer to Evidence:

The Supreme Court found no grave abuse of discretion in Sandiganbayan's denial of the demurrer. The presentation of evidence was adequate to establish the elements constituting

grave threats. The Sandiganbayan's role was to determine whether the prosecution's un rebutted evidence could stand and suffice for probable cause, pending further trial procedures.

****2. Sandiganbayan's Jurisdiction:****

The court reaffirmed jurisdiction based on the intimate connection of the alleged crime with the petitioner's public office. Alarilla's actions occurred during an official public hearing, purportedly in response to legislative scrutiny critical of his administration, hence implicating his role and functions as mayor. According to PD 1606, as amended by RA 7975, the Sandiganbayan had proper jurisdiction since the office and the offense were interrelated.

****3. Injunctive Relief:****

Petitioner's request for injunctive relief was denied. The continuation of the trial would proceed under the Sandiganbayan's jurisdiction unless substantial evidence of judicial violation, such as grave abuse of discretion, was adequately demonstrated.

Doctrine:

****Grave Threats in Office-related Context:****

A public officer's act can fall under the jurisdiction of the Sandiganbayan if committed in relation to the office held, even if the public office is not an explicit element of the crime. This is determined by the nature of the act and its connection to the functions and responsibilities of the said office.

Class Notes:

- ****Key Elements of Grave Threats:****
- Willful and unlawful threat to commit an act amounting to a crime.
- Intention to cause alarm or fear in another person.
- ****Revised Penal Code, Article 282: Definition and penal consequences.****

- ****Jurisdiction Over Office-Related Crimes:****
- ****RA 3019 Section 3(e):**** Emphasizes the offense's connection to public office and acts done in the official capacity.
- Jurisdiction is affirmed if the act is closely related to the office's functions even if not performed strictly in "official duties."

Historical Background

The case against Eduardo Alarilla arose amidst heightened sensitivity to public

accountability in the Philippines during the 1990s. During this period, there was significant governmental focus on ensuring that public officers could be held accountable for acts done in relation to their office, reinforcing the judiciary's role in mitigating and adjudicating acts of graft and official misconduct.