

Reyes vs. People of the Philippines (641 Phil. 91)

Facts:

Belen Lopez Vda. de Guia owned two agricultural land parcels in Bulacan. On March 19, 1975, her son, Carlos de Guia, forged a deed showing he purchased the land from Belen. The Register of Deeds canceled Belen's title (TCT No. 209298) and issued a new title in Carlos' name. Carlos then sold the land to Ricardo San Juan, who registered the sale and had the title in his name. Ricardo mortgaged the land to Simeon Yangco.

On December 20, 1975, Belen filed an adverse claim and a civil action to cancel the sales and reconvey the land. The court dismissed her complaint, which was affirmed by the Intermediate Appellate Court (IAC) due to non-payment of docket fees. Meanwhile, the tenants redeemed the land from Ricardo, who reconveyed it to them. Titles were issued to tenants.

Belen later discovered her appeal was dismissed and successfully moved to reinstate it. The IAC eventually annulled the sale deeds involving Carlos and Ricardo on February 20, 1986, the decision becoming final on March 15, 1986.

Despite this, Belen faced additional legal battles, including a contempt case she filed after learning about Ricardo's transaction with the tenants. The RTC declared Ricardo and the tenants in contempt, but only partially granted her motion by ordering reconveyance and payment of harvest shares.

In a separate agrarian case (DARAB Case No. 034-BUL'88), the Provincial Adjudicator, petitioner Jose Reyes, dismissed Belen's complaint for ejectment filed against the tenants, affirming their titles. This decision conflicted with the already final IAC ruling. Reyes also granted the tenants' motion for execution, denying Belen's urgent motion to set aside the execution.

On May 13, 1998, the Ombudsman charged Reyes with violating Section 3 (e) of RA 3019 (Anti-Graft and Corrupt Practices Act) and usurpation of judicial functions under Article 241 of the Revised Penal Code. Reyes was convicted by the Sandiganbayan on both counts, which led to his appeal to the Supreme Court.

Issues:

1. **Whether the petitioner was guilty of violating Section 3 (e) of RA 3019 in rendering his

decision in DARAB Case No. 034-BUL'88.**

2. **Whether the petitioner was guilty of usurpation of judicial functions under Article 241 of the Revised Penal Code.**

Court's Decision:

1. Violation of Section 3 (e) of RA 3019:

- The Court reaffirmed Reyes' conviction, noting his clear bias and bad faith. Reyes, as a public officer, disregarded a final and executory decision (CA No. 02883) that was binding.
- Reyes' decision effectively nullified Belen's recognized ownership and affirmed the titles of the tenants despite clear judicial mandates to the contrary.
- His actions caused undue injury to Belen and provided unwarranted benefits to the tenants.

2. Usurpation of Judicial Functions:

- The conviction for usurpation was reversed. Reyes acted within his quasi-judicial capacity as Provincial Adjudicator, a function allied with judicial acts, not usurping them.

Penalties:

- For RA 3019 violation, Reyes was sentenced to imprisonment of six years and one month to ten years, plus perpetual disqualification from holding public office.
- The mitigating factor of old age invoked by the Sandiganbayan was misapplied as Reyes was only 63 years at the offense time.

Doctrine:

1. **Anti-Graft and Corrupt Practices Act (RA 3019) Section 3 (e):** Imposes penalties on public officers causing undue injury through manifest partiality, evident bad faith, or gross inexcusable negligence.

2. **Finality of Decisions:** A final and executory decision gains immutability and cannot be modified by any court, emphasizing stability and conclusiveness in judicial processes.

Class Notes:

- **Elements of Violation under Section 3 (e) of RA 3019:**

1. Public officer duty.

2. Manifest partiality, evident bad faith, or gross negligence.

3. Substantial undue injury or unwarranted benefits.

- **Immutability of Judgment:** A principle ensuring once a decision is final, it remains inviolable to uphold justice and avoid endless litigation.

- **Article 241, Revised Penal Code:** Relates to unauthorized assumption of judicial powers but distinguishes lawful quasi-judicial functions from criminal usurpation.

Historical Background:

- The case's context highlighted the Agrarian Reform program's complexities, land ownership disputes, and judicial adherence to final rulings. The era also underscored a time when land rights were contentious, and administrative oversight often clashed with judicial pronouncements, reflecting systemic issues in enforcement and compliance.