

****Title**:** People of the Philippines vs. Hon. Demosthenes L. Magallanes et al.

****Facts**:**

On January 13, 1994, two informations for kidnapping for ransom with murder were filed with the RTC of Bacolod City against fourteen persons, including five members of the PNP: P/Col. Nicolas M. Torres, P/Insp. Adonis C. Abeto, and Police Officers Mario Lamis, Jose Pahayupan, and Vicente Canuday, Jr. The civilian accused included Jeanette Yanson-Dumancas, Charles Dumancas, Dominador Geroche, Jaime Gargallano, Rolando R. Fernandez, Edwin Divinagracia, Teody Delgado, Cesar Pecha, and Edgar Hilado. The informations alleged the involvement of the defendants in the kidnapping and murder of Rufino Gargar, Jr. and Danilo Lumangyao between August 6-7, 1992.

The accused were arraigned and pled not guilty. They filed motions for bail, which were partially granted by Judge Edgar G. Garvilles for six accused. The prosecution presented Moises Grandeza, a state witness and co-conspirator, who testified on the details of the kidnapping and murder, stating that the accused acted under orders from P/Col. Torres and with the involvement of Jeanette Yanson-Dumancas.

Judge Garvilles voluntarily inhibited himself following motions for his inhibition and the cases were re-raffled and assigned to Judge Demosthenes L. Magallanes. The private and state prosecutors filed motions to transfer the cases to the Sandiganbayan, which Judge Magallanes denied. Judge Magallanes resumed trial but then also inhibited himself after the prosecution had presented their evidence. The cases were re-raffled again.

The prosecution sought certiorari, prohibition, and mandamus to compel the transfer of the cases to the Sandiganbayan. During the pendency of these proceedings, R.A. No. 7975, amending the jurisdiction of the Sandiganbayan, was enacted.

****Issues**:**

1. Whether the RTC of Bacolod City or the Sandiganbayan has jurisdiction over the cases of kidnapping for ransom with murder implicating PNP officers.
2. Whether the allegations in the informations and the subsequent evidence showed that the crimes were committed in relation to the public office of the accused PNP officers.
3. Whether the motions for bail by respondents Jeanette Yanson-Dumancas and Nicolas Torres should be granted by the Supreme Court.

****Court's Decision**:**

The Supreme Court held that the RTC of Bacolod City retains jurisdiction over the cases. It ruled that:

1. The informations did not sufficiently allege that the crimes were committed in relation to

the official duties of the PNP officers, as required by prevailing jurisprudence and Section 4 of P.D. No. 1606 as amended by P.D. No. 1861.

2. The phrase “taking advantage of their positions” was deemed to be an aggravating circumstance and was not enough to establish that the crimes were committed in relation to their office. Such an assertion needed more specificity and intimate connection as seen in *People vs. Montejo* and *People vs. Montilla*.

3. The denial of motions for bail by Jeanette Yanson-Dumancas and Nicolas Torres was upheld for failure to adequately challenge the denial in a timely manner through proper channels. The Court adjudicated that the reconsideration of the trial court’s denial was a matter to be handled through normal appellate procedures, which the respondents had not followed.

****Doctrine**:**

1. ****Jurisdiction Determination****: Jurisdiction is determined by the allegations in the initial complaint or information, not by evidence presented during the trial.
2. ****Crimes in Relation to Office****: For an offense to be considered committed in relation to public office, it must either be defined as such in statutory terms or be intimately connected with the office, demonstrated explicitly in the information filed.
3. ****Aggravating Circumstances****: Allegations that merely describe the use or advantage of one’s office without constituting part of the crime’s statutory definition are regarded only as aggravating circumstances, not determinants of specialized jurisdiction (*Sandiganbayan*).

****Class Notes**:**

- ****Elements for jurisdiction of Sandiganbayan****: The crime must be related to public office duties and must meet requisite gravity and specificity in allegations.
- ****Legal Standards****: Pursuant to PD 1606, crimes need to be committed in line with official functions for the Sandiganbayan to hold jurisdiction.
- ****Bail Procedures****: Reiterates the necessity of following procedural steps for contesting bail denials, indicating the use of proper appellate procedures.
- ****Revised Penal Code****: Articles applying to multiple related crimes and aggravating circumstances.

****Historical Background**:**

This case was reflective of the legal principles concerning jurisdictional determination over crimes allegedly committed by public officials in the Philippines. There was a historical need to clearly delineate the jurisdiction of the Sandiganbayan and the regular courts, especially with the introduction of R.A. No. 7975 that limited the jurisdiction of the Sandiganbayan to

more explicitly high-ranking officials and specific allegations of office-related offenses. This case also contextualizes the procedural rigor required for making and contesting bail applications in the Philippine judicial system.