

Title:

Regidor Jr. and Zapatos vs. People of the Philippines

Facts:

1. **Charges Filed**:

- Petitioners Eleno T. Regidor, Jr. (Mayor) and Camilo B. Zapatos (Sangguniang Panglungsod Member) along with Vice Mayor Aniceto T. Siete and Acting Secretary Marlene L. Mangao, were charged with falsification of public documents in several criminal cases (Criminal Case Nos. 13689-95).

2. **Resolutions in Question**:

- The resolutions at the center of the case included granting salary increases, approving supplemental budgets, appointing a city health officer, and various other governmental matters.

- The accusations revolved around making it appear that these resolutions were deliberated upon and approved by the Sangguniang Panglungsod when they were not.

3. **Trial Proceedings**:

- The petitioners, except Mangao who was not arraigned, pleaded not guilty.

- Aniceto T. Siete died before arraignment.

- During the trial, conflicting claims arose between the defense and the prosecution regarding the authenticity and approval process of the resolutions.

4. **Prosecution Evidence**:

- Prosecution witnesses, including former council members, testified that the resolutions were not deliberated upon.

- Despite a subsequent ratification of some resolutions, the private complainants pursued the case, alleging misconduct.

5. **Defense Evidence**:

- Mayor Regidor claimed good faith, stating he relied on the certification of resolutions.

- The defense noted inaccuracies in the minutes and claimed they signed resolutions believing they were properly passed.

- Zapatos did not testify separately but adopted Regidor's evidence.

6. **Sandiganbayan Decision**:

- Petitioners were found guilty of falsification under Article 171 of the Revised Penal Code.

- Sentencing included imprisonment and fines for multiple counts of falsification.

Issues:

1. **Existence of Crime**:

- Whether falsification of public documents was committed by petitioners under Article 171, paragraphs 2 and 7 of the Revised Penal Code.

2. **Sufficiency of Evidence**:

- Whether the prosecution's evidence was strong enough to establish guilt beyond reasonable doubt.

3. **Affidavit of Desistance**:

- Whether the affidavits of desistance and the DILG's exoneration of administrative charges should impact the criminal charges.

4. **Testimonies**:

- The credibility and weight of testimonies, including those of the private complainants and defense witness Taburada.

5. **Intent and Good Faith**:

- Whether petitioners' defenses of good faith and lack of intent were sufficient defenses.

Court's Decision:

1. **Existence of Crime**:

- The Court held that all elements of falsification under Article 171 were present. Petitioners made it appear that resolutions were approved by the council when they were not.

2. **Sufficiency of Evidence**:

- The Court found the prosecution's evidence convincing, supported by witness testimonies and documentary evidence contradicting the minutes and showing that the deliberations did not occur.

3. **Affidavit of Desistance**:

- The Court noted that affidavits of desistance are unreliable and viewed with suspicion. The dismissals by the DILG were administrative and did not impact the criminal case.

4. **Testimonies**:

- The Court underscored the inconsistencies in the defense witness's testimony and held that the trial court's findings on the credibility of witnesses are binding.

5. **Intent and Good Faith**:

- The Court stated that good faith and lack of intent do not absolve liability in falsification, as the crime involves violating public faith and destroying truth in public documents.

Doctrine:

- ****Elements of Falsification by Public Officer under Article 171 of the RPC****:
 1. Offender is a public officer.
 2. Takes advantage of their position.
 3. Falsifies a document by performing acts like making it appear others participated when they did not, or issuing documents when no originals exist.
- ****Irrelevance of Intent to Gain in Falsification****:
 - Criminal liability under falsification does not require intent to gain or injure a third party but focuses on the breach of public faith.

Class Notes:

- ****Key Elements/Concepts****:
- ****Falsification of Public Documents****:
 - Involvement of a public officer.
 - Use of official position for falsification.
 - Acts outlined in Article 171, RPC.
- ****Article 171, RPC****:
 - Paragraph 2: Causing false participation.
 - Paragraph 7: Issuing documents without original.
- ****Threefold Liability Rule****:
 - Administrative, civil, and criminal liabilities are separate.
- ****Affidavit of Desistance****:
 - Its unreliability and limited impact on criminal cases.
- ****Statutory Provisions****:
 - ****Article 171, RPC** (Verbatim)**:
 - Enumerates acts constituting falsification by public officers.

Historical Background:

- ****Context of Case****:
 - The case arose from a backdrop of governmental operations in Tanguib City within the Philippines, highlighting issues of public document integrity and governmental transparency.
 - The case reinforces the judiciary's role in upholding public faith and accuracy of public

records against possible abuses by public officials.

This brief encompasses the intricate details and procedural history, as well as the doctrines and legal principles articulated by the Supreme Court in its decision on the falsification charges against Eleno T. Regidor, Jr. and Camilo B. Zapatos.