

Title: **People of the Philippines vs. Sandiganbayan and Victoria Amante**

Facts:

1. **January 14, 1994** - Victoria Amante, a member of the Sangguniang Panlungsod of Toledo City, Cebu, received a cash advance of P71,095.00 to defray seminar expenses.
2. **December 19, 1995** - Almost two years later, no liquidation of the cash advance had been made by Amante.
3. **December 22, 1995** - Toledo City Auditor Manolo V. Tulibao issued a demand letter to Amante to settle her unliquidated cash advance within seventy-two hours.
4. **May 17, 1996** - The Commission on Audit recommended further investigation of Amante to the Office of the Deputy Ombudsman for Visayas (OMB-Visayas).
5. **September 30, 1999** - OMB-Visayas recommended filing an Information for Malversation of Public Funds against Amante.
6. **April 6, 2001** - The Office of the Special Prosecutor (OSP) found probable cause to indict Amante.
7. **May 21, 2004** - OSP filed an Information with the Sandiganbayan for Amante's violation of Section 89 of P.D. No. 1445 (The Auditing Code of the Philippines).

Procedural Posture:

1. **November 18, 2004** - Amante filed a Motion to Defer Arraignment and Motion for Reinvestigation, arguing that she had already liquidated/refunded the cash advance and questioned the Sandiganbayan's jurisdiction.
2. **December 8, 2004** - OSP opposed the motion, asserting that liquidating the cash advance was a matter of defense to be established during the trial.
3. **February 28, 2005** - Sandiganbayan dismissed the case for lack of jurisdiction, indicating the matter was without prejudice and considering the motion moot and academic.
4. **Petition to the Supreme Court** - The People of the Philippines filed a petition under Rule 45 to reverse the Sandiganbayan's decision.

Issues:

1. **Whether the Sandiganbayan has jurisdiction over a case involving a member of the Sangguniang Panlungsod where the crime charged is committed in relation to office but not for violations specified under R.A. Nos. 3019, 1379, or specific provisions of the Revised Penal Code.**

Court's Decision:

- The Supreme Court ruled that the Sandiganbayan has jurisdiction over the case.

- **Jurisdiction Under P.D. No. 1606, as amended by R.A. No. 8249**: The Court considered Section 4(b) applicable, which covers other offenses committed by public officials in relation to their office.
- The Supreme Court explained that under Section 4(a) and 4(b), the designation of certain public officials, including members of the Sangguniang Panlungsod, extends to other offenses related to their office, not just those specified under anti-graft laws and certain provisions of the Revised Penal Code.
- **Application of Doctrine from Previous Cases**: The court utilized the principles from previous rulings (e.g., *Inding v. Sandiganbayan*) to establish that the Sandiganbayan's jurisdiction encompasses public officials committing crimes in relation to their office.
- **Intimate Connection**: It was highlighted that an offense committed intimately connected with the office and in performance of official functions fell within the jurisdiction of the Sandiganbayan, thus reinforcing its original jurisdiction over the respondent.

Doctrine:

- The key doctrine established is that the Sandiganbayan's jurisdiction can include other offenses or felonies committed by public officials in relation to their office as per Section 4(b) of P.D. No. 1606, as amended by R.A. No. 8249.
- When a crime is intimately connected with the official functions of the office, even if the crime itself is not explicitly listed (e.g., violations of the Auditing Code), it still falls under the Sandiganbayan's original jurisdiction.

Class Notes:

- **Key Elements**: Jurisdiction, public office, related offenses, procedural requirements, Sandiganbayan's scope.
- **Relevant Statutes**: P.D. No. 1606, R.A. No. 8249, The Auditing Code of the Philippines.
- **Application**: Jurisdiction determined by official rank and relation to office, intimate connection test, procedural posture emphasizing correct jurisdictional forum.

Historical Background:

- **Sandiganbayan**: Originally established to address public officer and employee misconduct, with evolving jurisdiction to encompass comprehensive anti-corruption endeavors.
- **Legislative Evolution**: Jurisdictional provisions underwent amendments to adapt to various scopes and responsibilities, reflecting evolving statutory frameworks with P.D. No. 1606, R.A. 7975, and R.A. 8249 shaping its current jurisdiction.