

Title:

Florentino T. Manuel vs. Hon. Felizardo S.M. De Guzman, et al.

Facts:

Florentino T. Manuel, the petitioner, was a Mining Engineer employed at the Regional Office of the Bureau of Mines in Surigao City. He was charged with estafa through falsification of public documents, specifically the Itinerary of Travel and Daily Time Records. The accusation claimed that he reported being on fieldwork on various dates in March 1974, when in reality he was neither on field duty nor in his office. On the basis of these falsified documents, he prepared a voucher and unlawfully claimed and received a total of P344.67 from the government, thus committing the offense.

He was arrested and managed to post bail for his temporary release. Manuel had not been arraigned due to multiple attempts and delays. His legal counsel filed a motion to quash or transfer the case to the Sandiganbayan, a special appellate collegial court in the Philippines, on February 21, 1979. However, this motion was denied by the Court of First Instance of Surigao del Sur. Manuel then sought relief with the Supreme Court through a petition for certiorari, prohibition, and mandamus, arguing that under P.D. No. 1606 which took effect on December 10, 1978, the Sandiganbayan has original and exclusive jurisdiction over his case.

Issues:

1. Whether estafa through falsification of public documents is a complex crime.
2. Whether the Sandiganbayan has exclusive jurisdiction over the case in question.

Court's Decision:

The Supreme Court held that estafa through falsification of public documents constitutes a complex crime under Article 48 of the Revised Penal Code. The falsification of public documents was the means to commit estafa. Furthermore, since falsification is penalized with prision mayor and the law directs that the penalty for the most serious crime should be imposed in its maximum period, the petitioner if convicted would face a higher penalty than prision correccional. Consequently, based on Sec. 4 of P.D. No. 1606, the Sandiganbayan has exclusive jurisdiction over cases involving public officers or employees charged with offenses punishable by a penalty higher than prision correccional. The Supreme Court granted the petition and ordered the transfer of Criminal Case No. 850 to the Sandiganbayan.

Doctrine:

1. A complex crime occurs when a single act constitutes two or more grave or less grave felonies, or when an offense is a necessary means for committing another. In such cases, the penalty for the most serious crime should be imposed in its maximum period.
2. Under P.D. No. 1606, the Sandiganbayan has exclusive jurisdiction over offenses committed by public officers or employees that are punishable by a penalty higher than prision correccional.

Historical Background:

Presidential Decree No. 1606, which created the Sandiganbayan, came into effect during the martial law era under President Ferdinand Marcos to exclusively handle cases against public officers and employees addressing corruption and abuse of power. This case highlights the jurisdictional scope of the Sandiganbayan in relation to crimes committed by public officials.

Class Notes:

- Complex Crime: An occurrence where one act leads to multiple offenses or an offense is instrumental in committing another, leading to the gravest penalty in its maximum range.
- Jurisdiction of Sandiganbayan: P.D. No. 1606 grants the Sandiganbayan exclusive jurisdiction over cases involving public officers if the offense charged is punishable by a penalty higher than prision correccional.
- Estafa through Falsification: This constitutes a complex crime where falsification of documents is employed to commit fraud, subjecting the offender to the penalties for falsification in its maximum period.

Relevant Legal Statutes:

- Revised Penal Code, Article 48: Imposition of penalty for complex crimes.
- P.D. No. 1606, Sec. 4: Jurisdiction of the Sandiganbayan over crimes committed by public officers or employees.

In the context of the case, the Supreme Court applied the principle of complex crimes and the specific jurisdictional mandate of the Sandiganbayan to direct the transfer of Criminal Case No. 850 to the said court.