

Title:

Marvin Cruz and Francisco Cruz vs. People of the Philippines

Facts:

The case stems from an Information dated September 19, 2013, where Marvin Cruz, alongside seven others, was charged with Robbery in an Uninhabited Place and by a Band involving items amounting to PHP72,000. Marvin Cruz posted a PHP12,000 cash bail. The complainant later issued an Affidavit of Desistance, leading the Assistant City Prosecutor to file a Motion to Dismiss, which was granted by the Regional Trial Court (RTC) in Malabon City on October 24, 2014.

Subsequently, Cruz and his bondsman Francisco filed a Motion to Release Cash Bond. On January 7, 2015, the RTC denied it, stating the case was dismissed due to desistance, not acquittal. The Motion for Reconsideration failed. The petitioners then approached the Court of Appeals via a Petition for Certiorari, arguing that the RTC gravely abused its discretion by denying the cash bond's release.

The Court of Appeals dismissed the petition on January 18, 2016, stating that an appeal should have been filed, not a petition for certiorari. The Court of Appeals underlined its ruling in a Resolution on June 1, 2016, after a Motion for Reconsideration from Cruz and Francisco was denied. The petitioners then took their plea to the Supreme Court.

Issues:

The sole legal issue in this case revolves around the appropriate remedy for challenging the RTC's denial of the motion to release the cash bond. Specifically, whether the RTC committed grave abuse of discretion, which would justify a Petition for Certiorari under Rule 65 of the Rules of Court, or whether the appeal was indeed the more appropriate course of action.

Court's Decision:

The Supreme Court ruled that the Court of Appeals erred in dismissing the Petition for Certiorari. It emphasized that the RTC's non-compliance with the Rules of Court related to the cancellation of bail constituted a grave abuse of discretion. The Supreme Court established that since the RTC's denial of the motion to release the cash bond was not premised on applicable legal grounds, and given there were no fines or costs against Cruz, their decision was to be regarded as a grave abuse of discretion, properly challenged by certiorari. Therefore, the Supreme Court reversed and set aside the decisions of the Court

of Appeals and remanded the case for a resolution on the merits.

Doctrine:

This case reiterates the doctrine that the bail shall automatically be deemed cancelled upon the acquittal of the accused, dismissal of the case, or the execution of the judgment of conviction, as established in Rule 114, Section 22 of the Rules of Court. Moreover, the case emphasizes the applicability of a Petition for Certiorari under Rule 65 when there is grave abuse of discretion amounting to lack or excess of jurisdiction by the lower court and where there is no appeal or other plain, speedy, and adequate remedy.

Class Notes:

- Rule 114, Sec. 22, Rules of Court: "Bail shall be deemed automatically cancelled upon acquittal of the accused, dismissal of the case, or execution of the judgment of conviction."
- Rule 65, Sec. 1, Rules of Court: "Petition for certiorari is appropriate when a tribunal acts 'without or in excess of its or his jurisdiction, or with grave abuse of discretion amounting to lack or excess of jurisdiction,' and 'there is no appeal, nor any plain, speedy, and adequate remedy in the ordinary course of law.'"
- Key concepts: Grave Abuse of Discretion, Automatic Cancellation of Bail, Petition for Certiorari vs. Appeal.

Historical Background:

The case of Marvin Cruz and Francisco Cruz vs. People of the Philippines captures the procedural complexities within Philippine jurisprudence, specifically addressing the recourse available to litigants when a lower court deviates from established rules of law. Historically, this case emphasizes the judiciary's constant effort to balance procedural adherence with justice delivery and the Supreme Court's role as a rectifying instrument when procedural errors impact substantive rights.