

Title: Lito Corpuz vs. People of the Philippines

Facts:

On May 2, 1991, private complainant Danilo Tangcoy entrusted Lito Corpuz with jewelry worth P98,000 to sell on a commission basis at the Admiral Royale Casino in Olongapo City. The agreement stipulated that Corpuz had to either remit the sale proceeds or return the unsold items within 60 days. Corpuz failed to do either and did not pay Tangcoy despite repeated demands. Consequently, Corpuz was charged with estafa under Article 315, paragraph (1), subparagraph (b) of the Revised Penal Code.

Corpuz pleaded not guilty and claimed the receipt in question was for a loan obtained in 1989 from a third party, which was falsely dated and used against him. Nevertheless, the RTC found him guilty of estafa and imposed a penalty involving imprisonment and indemnification. The Court of Appeals upheld the conviction with a modification regarding the prison term. Corpuz then took his case to the Supreme Court, raising issues over the admissibility of evidence, the alleged defect in the information, the proof of demand, and the credibility of the private complainants.

Issues:

1. Whether photocopies of prosecution evidence admitted by the lower courts violate the best evidence rule.
2. Whether the criminal information for estafa was fatally defective.
3. Whether the prosecution proved the element of demand essential for estafa.
4. Whether the prosecution's case was proven beyond reasonable doubt.

Court's Decision:

The Supreme Court denied Corpuz's petition, finding no merit in his arguments. It held that:

1. Corpuz waived his objection to the admissibility of photocopies when he failed to raise it on time.
2. The information was substantially complete, and objections as to its form and substance could not be raised for the first time on appeal.
3. The prosecution sufficiently established the demand made by the offended party.
4. The credibility of the private complainant was upheld, and the testimony was sufficient to establish the prosecution's case beyond reasonable doubt.

Doctrine:

The elements of estafa with abuse of confidence under Article 315, paragraph 1 (b) of the

Revised Penal Code are: (a) the receipt of money or property by the offender in trust or on commission for administration; (b) misappropriation, conversion, or denial of such receipt; (c) the prejudice of another; and (d) the demand by the offended party.

Class Notes:

- The case reiterates the doctrine that objections to evidence must be made at the time they are offered; failure to do so constitutes waiver.
- The information concerning a criminal case must be sufficiently comprehensive but does not need to detail each element of the crime with exactitude.
- The principle that when doubt exists regarding the interpretation or application of penal laws, it is presumed that the lawmaking body intended right and justice to prevail (Article 10 of the Civil Code).

Historical Background:

The historical context of Corpuz's case revolves around the principles underlying the Revised Penal Code, established in the early 20th century. Over time, the application and interpretation of these laws have evolved, and the case provides a reflection on the judiciary's role in balancing the application of the law against modern considerations of justice and equity. The case also reaffirms the doctrine of upholding credibility assessments made by trial courts in the absence of arbitrariness.