

Title: ****Monico Ligtas vs. People of the Philippines****

****Facts:****

This case involves Monico Ligtas, who was convicted of theft by the Regional Trial Court (RTC) and whose conviction was affirmed by the Court of Appeals. The theft was alleged to have occurred on June 29, 2000, in an abaca plantation owned by Anecita Pacate, from which 1,000 kilos of abaca fibers valued at Php29,000.00 were harvested without consent. Ligtas, asserting that he was a tenant of Pacate and had rights to the harvest, contested his conviction up to the Supreme Court.

At trial, the prosecution presented witnesses including the plantation's administrator and police officers, who testified on the unauthorized harvesting by Ligtas and his aggression towards the plantation workers. Conversely, the defense argued that Ligtas had been a tenant on Pacate's land since 1993 and had a rightful claim to the harvest. He presented witnesses, including himself, to support his tenancy claim.

Subsequent to his criminal charge, Ligtas filed a complaint with the Department of Agrarian Reform Adjudication Board (DARAB), which eventually declared him a bona fide tenant of the land, a declaration overlooked during his trial by both the RTC and the Court of Appeals, which convicted him of theft.

****Issues:****

1. Whether factual issues can be revisited in a petition for review under Rule 45 of the Rules of Court.
2. Whether the DARAB decision, declaring Ligtas a tenant, should be considered conclusive in the criminal case for theft.
3. Whether the Court of Appeals made an error in upholding Ligtas's conviction for theft despite the DARAB's findings.

****Court's Decision:****

The Supreme Court granted the petition, reversed and set aside the Court of Appeals' decision, and acquitted Monico Ligtas of theft. It held that the DARAB's declaration of Ligtas as a bona fide tenant significantly negates the prosecution's assertion that Ligtas harvested the abaca without consent, thereby voiding essential elements required to establish theft. The SC emphasized that administrative findings, especially when they attain

finality, are binding upon courts regarding facts they establish.

****Doctrine:****

The case reinforced the principle that administrative decisions, especially concerning tenancy relationships, which have reached finality can bind criminal courts in related matters. It also highlighted the doctrine that could allow for the review of factual issues by the Supreme Court when the factual bases of the conviction are intertwined with wrongly interpreted or overlooked substantial evidence, such as the DARAB decision.

****Class Notes:****

- ****Theft under Article 308 of the Revised Penal Code**** requires: (1) taking personal property, (2) belonging to another, (3) without the latter's consent, (4) with intent to gain, (5) without violence or intimidation against persons, nor force upon things.
- ****Tenancy Relationship:**** Under Philippine law, a tenancy relationship gives the tenant certain rights to the produce of the land, which presupposes the owner's consent to such harvesting activities. It underscores the importance of establishing a tenancy relationship, primarily via administrative adjudication.
- ****Review of Factual Issues:**** While generally, only questions of law may be entertained in a Petition for Review under Rule 45, factual issues may be reconsidered if the case falls under recognized exceptions, such as when the judgment is premised on a misapprehension of facts or when facts and evidence are overlooked that, if taken into account, would lead to a different conclusion.

****Historical Background:****

This decision illustrates the Philippine judiciary's recognition of the binding effect of administrative findings on criminal proceedings, especially in agrarian disputes involving tenancy issues. It underscores the legal system's dynamics where administrative determinations, particularly those involving specialized agencies like DARAB regarding agrarian reforms, can influence, and at times dictate, the outcome of criminal cases, providing a crucial intersection between administrative and criminal law.