

Title:

****Victoria B. Collado vs. Dr. Eduardo M. Dela Vega: A Case of Civil Liability Amidst Criminal Acquittal****

Facts:

In November 1995, Eduardo M. Dela Vega was introduced to Victoria B. Collado, leading to his investment in Victoria's stock business with the expectation of earning a monthly interest rate of 7.225%. Despite investing substantial amounts, Eduardo did not receive any stock certificates. In October 1998, Victoria issued Eduardo checks totaling P740,000.00, which were later dishonored. Consequently, Eduardo filed an estafa case against Victoria. On March 26, 2009, the RTC acquitted Victoria due to reasonable doubt and found no preponderant evidence of her civil liability. Dissatisfied, Eduardo appealed the civil aspect of the case to the CA, which, upon review, held Victoria civilly liable to pay Eduardo P2,905,000.00. Victoria's motion for reconsideration was denied; thus, she elevated the case to the Supreme Court under Rule 45 of the Rules of Court.

Issues:

1. Whether the CA erred in reversing the RTC's decision regarding Victoria's civil liability despite her acquittal on the grounds of reasonable doubt.
2. Whether under the Philippine legal system, an individual acquitted on criminal charges can still be held civilly liable based on the preponderance of evidence.
3. Whether the factual findings by the CA, contradicting those of the RTC, justify the Supreme Court's review of the evidence to establish civil liability.

Court's Decision:

The Supreme Court denied Victoria's petition, affirming the CA's decision to hold her civilly liable to Eduardo in the amount of P2,905,000.00. The Court clarified that questions regarding the appreciation of evidence are generally beyond its jurisdiction in a Rule 45 review, except when the CA and RTC findings are contradictory. The Court further elucidated that an acquittal based on reasonable doubt does not preclude a finding of civil liability, requiring only a preponderance of evidence. The CA's thorough examination of evidence, including bank deposit slips and admissions, sufficiently established Victoria's civil liability.

Doctrine:

The case reinforces the doctrine that an individual's acquittal on criminal charges due to reasonable doubt does not necessarily absolve them from civil liability. In civil cases, only

the preponderance of evidence is required to establish liability.

Class Notes:

- **Key Elements for Civil Liability Amidst Criminal Acquittal**: Civil cases require only a preponderance of evidence, a lower threshold than “beyond reasonable doubt” used in criminal cases.
- **Relevant Legal Statutes**:
 - Rule 45 of the Rules of Court on the grounds for a petition for review on certiorari.
 - Article 100 of the Revised Penal Code on the separate and independent nature of civil liability from the criminal action.
- **Application**: These statutes were applied to affirm that despite Victoria’s criminal acquittal, the evidence sufficiently supported a finding of civil liability.

Historical Background:

This case underscores the dichotomy within the Philippine legal system between criminal and civil liabilities. Specifically, it illustrates the jurisdictional nuances and evidentiary standards separating the determination of criminal guilt from the adjudication of civil responsibilities, emphasizing the principle that an acquittal on criminal grounds does not absolve an accused from potential civil liabilities arising from the same act or omission.