

### Title: Danica L. Medina vs. People of the Philippines

### Facts:

Danica L. Medina was charged with estafa, accused of misappropriating P88,452.00 entrusted to her for deposit in a bank on behalf of the Philippine Public School Teachers Association (PPSTA) from September 2011 to March 2012 in Baguio City. Medina, working as Regional Office Staff for PPSTA-CAR, allegedly failed to deposit collections and convert them for personal use. The prosecution presented testimony from PPSTA's Chief Accountant, two retired teachers (PPSTA members), and documentary evidence including employment contracts, acknowledgment receipts, and a report of an Ad Hoc Committee audit finding Medina's failure to remit collected funds. Medina's defense was primarily denial, arguing PPSTA never entrusted her with money and disputing the claims of misappropriation.

### Issues:

1. Whether the prosecution proved beyond reasonable doubt Medina's guilt for the crime of estafa.
2. Whether Medina had juridical possession of the funds, a requisite element for the crime of estafa.
3. Whether the evidence presented was adequate to establish the misappropriation or conversion of funds for personal use.
4. The applicability of qualified theft as an alternative conviction.

### Court's Decision:

The Supreme Court reversed the Court of Appeals' decision, acquitting Medina due to failure to prove guilt beyond reasonable doubt for estafa or qualified theft. The Court determined that the prosecution failed to establish both the taking element and Medina's juridical possession of the funds—a necessity for estafa conviction. For qualified theft, the Court also found insufficient evidence, particularly the absence of direct proof of taking which is critical for theft, highlighting reliance on unauthenticated acknowledgment receipts and hearsay evidence.

### Doctrine:

1. **\*\*Juridical Possession in Estafa\*\***: Employing an employee to handle funds without transferring independent right or title does not confer juridical possession, thus disqualifying actions from constituting estafa.
2. **\*\*Evidence in Theft\*\***: For theft convictions, direct evidence of taking is essential.

Reliance on unauthenticated documents or hearsay evidence is insufficient for establishing guilt beyond reasonable doubt.

**### Class Notes:**

- **Estafa under Article 315, RPC**: Requires proof of juridical possession and misappropriation or conversion of funds with intent to defraud.
- **Qualified Theft**: Characterized by the theft of property, aggravated by abuse of confidence or grave abuse of confidence.
- **Juridical vs. Material Possession**: Juridical possession involves a right over the property that the possessor can enforce against the owner, whereas material possession is merely physical control without such right.
- **Proof beyond Reasonable Doubt**: The standard required for criminal conviction, necessitating clear, compelling, and unambiguous evidence pointing to guilt, excluding all reasonable possibilities of innocence.
- **Hearsay Rule**: Statement made outside the court that is offered as evidence to prove the truth of the matter asserted is inadmissible unless the maker of the statement appears in court to provide direct testimony.

**### Historical Background:**

This case revisits the principles surrounding the crimes of estafa and theft in the Philippine legal system, emphasizing the necessity of juridical possession for estafa and highlighting the challenges in proving misappropriation or conversion of funds. It underscores the judiciary's adherence to stringent standards for criminal convictions, notably the need for evidence that conclusively establishes guilt and excludes the possibility of innocence.