

Title: Intestate Estate of Manolita Gonzales Vda. De Carungcong vs. People of the Philippines and William Sato

Facts:

This case revolves around the legal battle initiated by Mediatrix G. Carungcong, acting as the administratrix of her late mother Manolita Gonzales Vda. De Carungcong's estate, against her brother-in-law William Sato, a Japanese national. Accused of estafa through falsification, Sato allegedly deceived Manolita into signing a Special Power of Attorney (SPA) under the pretense of dealing with her taxes, which instead authorized the sale of four valuable lands in Tagaytay City. These lands were subsequently sold under misrepresentations, with the proceeds never turned over to Manolita's estate.

Initially dismissed by the City Prosecutor of Quezon City, the complaint was later reversed by the Secretary of Justice, directing the filing of an Information against Sato for estafa under Article 315, paragraph 3(a) of the Revised Penal Code. However, Sato filed a motion for the quashal of the Information, invoking Article 332 of the Revised Penal Code, which exempts from criminal liability crimes of swindling among certain family members. The trial court granted the motion and dismissed the case, a decision upheld by the Court of Appeals, leading to the current petition in the Supreme Court.

Issues:

1. Does the death of a spouse dissolve the relationship by affinity created between a man and his in-laws, thereby making Article 332 of the Revised Penal Code inapplicable?
2. Does Article 332 cover the complex crime of estafa through falsification?

Court's Decision:

The Supreme Court granted the petition, reversing the lower courts' rulings. It held that:

- The relationship by affinity between a surviving spouse and the blood relatives of the deceased spouse continues even after the death of either party to the marriage, for the purposes of Article 332.
- Article 332 of the Revised Penal Code does not apply to the complex crime of estafa through falsification of public documents.
- The allegations in the Information pointed to a charge not of simple estafa but of the complex crime of estafa through falsification of public documents.

Doctrine:

This decision establishes the doctrine that Article 332 of the Revised Penal Code, providing

exemptions from criminal liability for certain family members, continues to apply by affinity even after the death of one spouse. It clarifies, however, that this exemption does not extend to complex crimes involving estafa through falsification of public documents.

Class Notes:

- **Article 332 of the Revised Penal Code** exempts from criminal liability crimes of theft, swindling, and malicious mischief among spouses, ascendants, descendants, and relatives by affinity in the same line. This exemption applies even after the death of a spouse.
- **Complex Crime**: When two or more grave or less grave felonies are committed by a single act, or one offense is a necessary means for committing the other, they constitute a complex crime, which incurs a single penalty (Article 48, Revised Penal Code).
- **Estafa through Falsification of Public Documents**: A complex crime where falsification of a public document is used as a means to commit estafa. The criminal liability arises not from the individual offenses but from the combination as a complex crime.

Historical Background:

Understanding the context of this case requires an appreciation of the familial and societal values protected under Philippine law, specifically the integrity of family relations. The Supreme Court's decision balances these values against the public interest in preventing and punishing fraud, particularly when it involves the falsification of public documents.