

Title:

Jurisdiction Over Concubinage: People of the Philippines vs. Hon. Henedino P. Eduarte, Elvino Aggabao, and Villa Suratos

Facts:

The case originates from a criminal complaint filed by Alma T. Aggabao against Elvino Aggabao (her husband) and Villa Suratos for concubinage, allegedly committed in September 1983. The Office of the Provincial Fiscal of Cabagan, Isabela, filed the criminal information with the Regional Trial Court (RTC) of Cabagan, Isabela, Branch 22, on July 25, 1986. The defendants pleaded not guilty and were represented by private prosecutors.

During the trial, the defendants filed a motion to dismiss based on the claim that the RTC lacked jurisdiction to hear the case, arguing that the penalty for concubinage falls within the jurisdiction of Municipal Trial Courts. The trial court agreed and dismissed the case, prompting the prosecutors to appeal to the Supreme Court.

The appeal faced initial rejection due to late docket fees payment and was deemed lacking in merit. A motion for reconsideration was filed by the Solicitor General and the private prosecutor, challenging the jurisdictional dismissal and arguing that the RTC has jurisdiction over concubinage.

Issues:

1. Whether the Regional Trial Court has jurisdiction over the crime of concubinage.
2. Whether private respondents are estopped from questioning the jurisdiction after the prosecution has rested its case.
3. The applicability and interpretation of the Judiciary Reorganization Act of 1980 regarding jurisdiction over concubinage.

Court's Decision:

The Supreme Court held that the case of concubinage is within the exclusive original jurisdiction of inferior courts (i.e., Municipal Trial Courts), not the RTC. The Court emphasized that jurisdiction can be challenged at any stage of the proceedings and rejected the application of estoppel in the present case. The Supreme Court justified its decision by interpreting the penalties for concubinage as outlined in the Revised Penal Code and applying the Judiciary Reorganization Act of 1980. The Court clarified that crimes

punishable with destierro are within the jurisdiction of inferior courts, leading to the conclusion that the Regional Trial Court indeed lacked jurisdiction over the concubinage case. The Court also remarked that this jurisdictional arrangement supports the orderly administration of justice by trying the accused in a single court.

Doctrine:

The Supreme Court reiterated the doctrine that jurisdiction over a case can be questioned at any stage of the proceedings. Additionally, the Court held that crimes punishable with destierro are within the exclusive jurisdiction of inferior courts, as destierro is considered a penalty lighter than imprisonment. This decision provided clarity in applying the Judiciary Reorganization Act of 1980 to such cases.

Class Notes:

1. **Jurisdiction over Concubinage**: Under Philippine law, concubinage is punishable by prision correccional for the husband and destierro for the concubine. The Supreme Court ruling confirms that such cases fall within the exclusive original jurisdiction of Municipal Trial Courts, not Regional Trial Courts.
2. **Jurisdiction Can Be Challenged at Any Stage**: Reflecting on the principle that jurisdictional errors are not subject to the doctrine of estoppel, the Supreme Court held that questions of jurisdiction can be raised at any stage of the proceedings, even after the prosecution has rested its case.
3. **Destierro's Jurisdictional Placement**: Destierro, being a lighter penalty than imprisonment (even if its maximum period exceeds that of arresto mayor), falls within the jurisdiction of inferior courts. This aligns with the principle that jurisdiction is determined by the nature and severity of penalties.

Historical Background:

This case elucidates the jurisdictional demarcation between Regional Trial Courts and Municipal Trial Courts under the Judiciary Reorganization Act of 1980. By affirming that crimes punishable with destierro, such as concubinage, fall under the jurisdiction of inferior courts, the Supreme Court addressed a vital aspect of procedural law that affects the administration of criminal justice in the Philippines. This ruling reinforces the legal framework established by the Judiciary Reorganization Act and clarifies the implementation of the Revised Penal Code concerning concubinage.