

****Title:**** The Application of Prejudicial Question in Dismissing Criminal Cases due to a Final and Executory Civil Case Decision: People of the Philippines vs. Camilo Camenforte and Robert Lastrilla

****Facts:****

This case revolves around a property dispute leading to multiple legal actions. The Granda spouses sold various parcels of land to different vendees, including the Uy siblings and respondent Lastrilla, through three Deeds of Sale, all dated December 7, 1985. Roughly 15 years later, the sales were annotated on the titles. After Aurora Granda's death, her grandson, Rafael A. Granda, discovered the sales and alleged that the signatures of his grandparents were forged. Criminal informations were filed against several individuals, including respondents Camenforte and Lastrilla, for falsification but were dismissed for Lastrilla and the Uy siblings upon review. Only the criminal charges against Camenforte and Silvina proceeded. Meanwhile, a civil case for the nullification of the titles and deeds was filed by Benjamin Granda and Blanquita Serafica, which was eventually dismissed, and the decision became final. The respondents then filed motions to dismiss the criminal cases against them, citing the final civil case's decision as a ground, which was granted by the Regional Trial Court (RTC). The People, through the Office of the Solicitor General, appealed unsuccessfully to the Court of Appeals (CA).

****Issues:****

1. Whether the principle of res judicata applies to bar the prosecution in the pending criminal cases.
2. Whether a prejudicial question exists due to the final and executory decision of the civil case, thereby preventing the continued prosecution of the criminal cases.

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

The Supreme Court denied the petition, affirming the CA's decision with modification. The Court held that while res judicata did not bar the prosecution of the criminal cases for lack of identity of parties and cause of action, a prejudicial question existed. The final and conclusive finding of the genuineness of signatures in the related civil case barred the prosecution in the criminal cases. Thus, the criminal cases against respondents Camenforte and Lastrilla were properly dismissed.

****Doctrine:****

The doctrine of a prejudicial question involves cases wherein a civil action and a criminal action are pending, and the issue in the civil action is determinative of the issue in the

criminal action. The resolution of the issue in the civil case must precede that of the criminal case, thereby preventing the criminal case from proceeding in the meantime.

****Class Notes:****

- ***Res Judicata*:** Requires final judgment by a competent court, jurisdiction over the subject matter and parties, a judgment on the merits, and identity of parties, subject matter, and cause of action.
- ***Prejudicial Question*:** Requires a civil action previously instituted that involves an issue similar or intimately related to the issue in a subsequent criminal action, where the resolution of the civil issue determines whether the criminal action may proceed.
- The concept of a prejudicial question may sometimes apply even if the technical sequence of filing does not strictly follow the rule, provided the issue in the civil case is determinative of the guilt or innocence in the criminal case.
- Forging or fabricating documents requires proof beyond reasonable doubt in criminal cases, while in civil cases, the burden of proving forgery is by preponderance of evidence.
- ***Clear and Convincing Proof*:** Necessary to overcome the presumption of genuineness and due execution of a notarized document.

****Historical Background:****

This case reinforces the interplay between criminal prosecutions and determinations made in civil proceedings. Reflecting upon the procedural journey and application of legal principles, it enriches the jurisprudential landscape, particularly on the concepts of res judicata and prejudicial question within the Philippine legal system. This discourse amplifies the procedural strategy and evidentiary standards required in intertwined civil and criminal litigations, affirming the precedence of civil case determinations over related criminal proceedings under the doctrine of prejudicial question.