

Title: People of the Philippines vs. Hon. Judge Dimalanes Buissan, et al.

Facts:

Paterno Santiago was charged with the crime of simple seduction in the City of Dapitan, Zamboanga del Norte, based on a complaint by Araceli C. Medel alleging that Santiago had sexual intercourses with her under the promise of marriage, leading to her pregnancy. The case was docketed as Criminal Case No. 2258 at the Court of First Instance (CFI) of Zamboanga del Norte. Santiago pleaded not guilty upon arraignment on September 3, 1979. Later, Santiago filed a motion to quash the information, citing a “failure to allege lewd design.” On November 16, 1979, Judge Buissan denied the motion but remanded the case to the City Court of Dapitan citing lack of jurisdiction by the CFI since the prescribed penalty for simple seduction is *arresto mayor*. The People of the Philippines filed a motion for reconsideration, which was denied. Subsequently, the case was set for trial at the City Court by Judge Wilfredo C. Martinez. Contesting the jurisdiction and decisions of Judges Buissan and Martinez, the People of the Philippines filed a petition for certiorari, prohibition, and mandamus with the Supreme Court.

Issues:

The sole legal issue was whether the jurisdiction for a criminal case of simple seduction, which is penalized by *arresto mayor*, falls exclusively under a municipal or city court.

Court’s Decision:

The Supreme Court granted the petition, directing that the case be returned to the CFI of Zamboanga del Norte for trial on the merits. It held that while the apparent jurisdiction for crimes punishable by *arresto mayor* lies with municipal or city courts, the accessory obligations in a case of simple seduction, such as the acknowledgment and support of the offspring, extend beyond the jurisdiction of municipal or city courts, thereby placing jurisdiction with the Court of First Instance. This principle is supported by prior rulings that emphasized the impracticality and legal inconsistency of bifurcating the criminal and civil aspects of simple seduction cases between municipal and CFI courts.

Doctrine:

The Supreme Court reaffirmed the doctrine that the Courts of First Instance have jurisdiction over cases of simple seduction due to the inherent accessory civil liabilities arising from the crime, such as the acknowledgment and support of the offspring which are matters beyond the jurisdiction of municipal or city courts.

Class Notes:

- Jurisdiction in Criminal Cases: Determined by the law's prescribed penalty for the offense together with any inherent accessory civil liabilities, not by the eventual punishment or evidence presented.
- Simple Seduction: Comprises both a criminal aspect punishable by *arresto mayor* and accessory civil liabilities including acknowledgment and support of the offspring, dictating jurisdiction to reside with the Court of First Instance.
- Principle of Judicial Consistency and Practicality: Highlights the impracticality and inconsistency in dividing the adjudication of a case's criminal and civil components between lower and higher courts, supporting a unified jurisdiction approach.

Historical Background:

The decision underscores the Philippine Supreme Court's adherence to longstanding jurisprudence that emphasizes the comprehensive interpretation of jurisdictional statutes, especially in cases where the criminal offense carries inherent civil responsibilities. This case reaffirmed principles dating back to early 20th-century rulings, ensuring a consistent and orderly administration of justice across different types of legal claims connected to criminal acts.