

Title: The People of the Philippines vs. Ricardo Beriales, Benedicto Custodio, and Pablito Custodio

Facts:

The case involves the prosecution of Ricardo Beriales, Benedicto Custodio, and Pablito Custodio in the Court of First Instance. The controversy centers around the proper conduct of criminal prosecutions, specifically the requirement of the fiscal's (prosecutor's) presence at trial proceedings. During the prosecution of the case in question, an incident occurred where evidence was presented by a private prosecutor in the absence of the fiscal, his assistant, or any duly authorized special counsel. This procedural irregularity led to questions regarding the admissibility and consideration of the evidence presented under such circumstances. Consequently, the matter was escalated to the Philippine Supreme Court for a ruling on this legal procedural issue.

Issues:

1. Whether the fiscal's duty to direct and control the prosecution of criminal cases mandates his/her presence during trial proceedings.
2. Whether evidence presented in the absence of the fiscal or his duly authorized representative can be considered as evidence for the People of the Philippines.
3. The applicability of the fiscal's presence requirement in various courts, including municipal courts and city courts without their own City Fiscals.

Court's Decision:

The Supreme Court clarified that the fiscal's duty to direct and control the prosecution of criminal cases indeed requires his/her presence during the proceedings. This requirement ensures the proper administration of justice and the adherence to legal protocols. Consequently, evidence presented by a private prosecutor in the absence of the fiscal or his/her assistant or duly authorized special counsel cannot be considered as evidence for the People of the Philippines. This ruling specifically applies to Courts of First Instance, Criminal Circuit Courts, and City Courts provided by law with their own City Fiscals, and does not extend to municipal courts and City Courts that do not have their own City Fiscals. In such instances, the rules governing the prosecution of criminal cases remain unchanged, with police, constabulary, law enforcement officers, and private prosecutors allowed to prosecute criminal cases under certain conditions.

Doctrine:

The doctrine established by this resolution emphasizes the fiscal's paramount role in the

prosecution of criminal cases, underscoring that his/her presence during trial proceedings is indispensable for the consideration of evidence. It further differentiates the procedural requirements for the trial of criminal cases across different types of courts, specifying where the rule applies and where it does not.

Class Notes:

- The fiscal's (prosecutor's) role in criminal prosecutions is central, requiring direct and active participation in the trial.
- Legal proceedings and the admission of evidence are dependent on the proper execution of this role.
- The applicability of these procedural requirements varies among different types of courts.

Historical Background:

This resolution addresses and clarifies procedural ambiguities related to the fiscal's role in criminal prosecutions within the Philippine judicial system. It draws from and interprets existing rules and doctrines, notably drawing inspiration from earlier rulings such as *U.S. vs. Despabiladeras* and the procedures outlined in the Revised Rules of Court. The resolution serves to prevent the misinterpretation of these procedural requirements, ensuring the uniform administration of justice and the correct direction of criminal prosecutions across various courts within the Philippines.