

Title: Eileen P. David vs. Glenda S. Marquez

Facts: The case arises from a Sinumpaang Salaysay filed by Glenda Marquez, the respondent, alleging that in March 2005, Eileen David, the petitioner, offered her recruitment services for overseas employment in Canada and collected placement fees. Marquez's application was consequently denied, and the fees she had paid were never refunded. David countered that she was in Canada during the said period, denying any recruitment activities and claiming that the money transferred to her account was meant for a friend who was processing Marquez's application. Following these exchanges and allegations, separate Informations for Illegal Recruitment and Estafa were filed against David in Manila, despite David's assertions that any supposed recruitment activities took place in Kidapawan City, not Manila. David's Motion to Quash based on jurisdictional challenges and procedural grounds was initially denied by the Regional Trial Court (RTC) of Manila, but upon reconsideration, the RTC dismissed the cases citing lack of jurisdiction, a decision which David further challenged, arguing the RTC of Manila lacked jurisdiction due to the alleged crime location and identifying procedural missteps on the part of the complainant.

Issues:

1. Jurisdiction of the Regional Trial Court (RTC) of Manila over Illegal Recruitment and Estafa cases.
2. Legal standing of Glenda Marquez to file a petition for certiorari challenging the RTC's dismissal of the criminal cases.

Court's Decision:

The Supreme Court found that the RTC of Manila indeed had jurisdiction over the cases under Section 9 of Republic Act 8042, which permits filing of criminal actions related to illegal recruitment in the location where the offended party resides. The Court held that Marquez's residence in Manila warranted jurisdiction of the Manila RTC over the case. In addition, the Supreme Court recognized Marquez's right to question the dismissal of the criminal cases through a petition for certiorari, as it pertained to the civil aspect of the cases from which she could suffer direct injury. The Court affirmed the decision and resolution of the Court of Appeals, reinstating the cases for trial in the RTC of Manila.

Doctrine:

Venue in criminal cases related to illegal recruitment can be based on the residence of the offended party at the time of the commission of the offense, as per Section 9 of Republic Act

No. 8042 (Migrant Workers and Overseas Filipinos Act of 1995). Moreover, in specific exceptional cases, the private offended party is granted legal standing to file a petition for certiorari when a grave abuse of discretion amounting to lack or excess of jurisdiction or a denial of due process is evident.

Class Notes:

- Jurisdiction in Criminal Cases: The offense should have been committed or any one of its essential ingredients took place within the territorial jurisdiction of the court, with an alternative venue for illegal recruitment cases being the residence of the offended party at the time of the offense.
- Rule 65 Petition for Certiorari: Legal remedy available to an aggrieved party when there is no appeal or any plain, speedy, and adequate remedy in the ordinary course of law, applicable to private offended parties in criminal cases on jurisdictional grounds that do not put the accused in double jeopardy.
- Double Jeopardy: Does not attach when the dismissal of a case is due to the accused's own action or due to a court's grave abuse of discretion, lack, or excess of jurisdiction.

Historical Background:

This case underscores the complexities involved in legal jurisdiction over criminal cases, particularly those arising from alleged illegal recruitment activities. It highlights the Philippine judiciary's approach to ensuring that justice is accessible to aggrieved parties by allowing alternative venues for filing criminal actions and recognizing the rights of private offended parties to seek remedies through special civil actions.