Title:
Ana Lou B. Navaja vs. Hon. Manuel A. de Castro et al.: Jurisdiction and Venue in Criminal Cases

Facts:
The case started with a Complaint-Affidavit filed by DKT Philippines, Inc., through Atty. Edgar Borje, against Ana Lou B. Navaja. Navaja was accused of falsifying a receipt to claim a higher reimbursement amount than she was entitled to, while employed as Regional Sales Manager. Specifically, it was alleged that she altered a receipt from Garden Cafe, Jagna, Bohol, changing the amount from P810.00 to P1,810.00, and submitted this for reimbursement. Based on these allegations, she was charged with falsification of a private document in the Municipal Circuit Trial Court (MCTC) of Jagna-Garcia-Hernandez, Bohol, under Criminal Case No. 2904.

Navaja contested the MCTC's jurisdiction, arguing that none of the elements of the offense occurred in Jagna, Bohol, thereby making the venue improper. Her Motion to Quash and subsequent Motion for Reconsideration were both denied by the MCTC. Navaja escalated the matter to the Regional Trial Court (RTC) of Loay, Bohol, Branch 50, which also ruled against her, holding that evidence indicated the falsification occurred in Jagna.

Dissatisfied, Navaja appealed to the Court of Appeals (CA) which affirmed the RTC's decision. Undeterred, she then filed a petition for review on certiorari with the Supreme Court.

Issues:
1. Whether the Municipal Trial Court of Jagna, Bohol has jurisdiction over the criminal case.
2. Whether the venue for the trial of the case was properly laid in Jagna, Bohol.
3. Whether a petition for certiorari is an appropriate remedy to contest the denial of a motion to quash based on improper venue.

Court's Decision:
The Supreme Court dismissed Navaja's petition, affirming the decisions of both the Court of Appeals and the lower courts. It ruled that the allegations in both the Information and the Complaint-Affidavit sufficed to establish prima facie that falsification was committed in Jagna, Bohol. Consequently, the Municipal Trial Court of Jagna-Garcia-Hernandez had jurisdiction over the case.

Moreover, the Court clarified that venue in criminal cases, being an element of jurisdiction,

must be determined based on where the crime was committed or where any of its essential ingredients took place. The Court also held that a petition for certiorari is not the proper remedy against the denial of a motion to quash an information except under exceptional circumstances, none of which were present in Navaja's case.

Doctrine:
This case reiterated the doctrine that in criminal prosecutions, the venue, as an element of jurisdiction, is determined by where the offense was committed or where any of its essential ingredients occurred. It also underscored that an order denying a motion to quash is interlocutory and not appealable, nor can it be the subject of a petition for certiorari unless under highly exceptional circumstances.

Class Notes:
– **Jurisdiction in Criminal Cases**: Jurisdiction is determined by the allegations in the complaint or information, specifically where the offense was committed or some of its essential ingredients occurred.
– **Venue**: In criminal cases, venue is jurisdictional. It is based on the place where the crime or any of its essential ingredients took place.
– **Petition for Certiorari**: Generally, a petition for certiorari is not an appropriate remedy for contesting an interlocutory order such as the denial of a motion to quash. Exceptional circumstances for its application include grave abuse of discretion or jurisdictional overreach by the lower court.

Historical Background:
In Philippine criminal procedure, the significance of proper venue has evolved to underscore the principle of territorial jurisdiction, which aims to avoid inconvenience to the accused and ensure a fair trial. This case is an exemplification of the judiciary's rigorous adherence to procedural rules governing jurisdiction and venue to uphold due process and judicial efficiency.