

**\*\*Title:\*\*** Maximino Valdepeñas vs. The People of the Philippines

**\*\*Facts:\*\*** The criminal proceedings against Maximino Valdepeñas began with a complaint filed on January 25, 1956, by Ester Ulsano, a minor, assisted by her mother Consuelo Ulsano. They accused Valdepeñas of forcible abduction with rape. This case was initially lodged in the Justice of the Peace Court of Piat, Cagayan, which, after a preliminary investigation—partly waived by Valdepeñas—found probable cause and transferred the case to the Court of First Instance (CFI) of Cagayan. The CFI convicted Valdepeñas as charged, imposing a sentence accordingly.

Valdepeñas appealed to the Court of Appeals, which modified the CFI’s decision, convicting him of abduction with consent and adjusting the penalty. Following a motion by Valdepeñas contesting the complainant’s age, the Court of Appeals remanded the case for re-trial on this point. After re-trial, the CFI reaffirmed its conviction, leading to a second appeal where the Court of Appeals upheld its conviction, faced by another motion from Valdepeñas challenging the courts’ jurisdiction. Upon denial of this motion, Valdepeñas appealed by certiorari to the Supreme Court.

**\*\*Issues:\*\***

1. Whether the courts had jurisdiction over the person of Valdepeñas.
2. Whether the courts had jurisdiction over the crime of abduction with consent.
3. Whether the initial complaint, charging forcible abduction with rape, could legally allow for a conviction of abduction with consent.

**\*\*Court’s Decision:\*\***

The Supreme Court dismissed Valdepeñas’s pretensions. It held that:

1. Jurisdiction over Valdepeñas’s person was established through either his apprehension or his submission to the court’s jurisdiction. Given his involvement in the proceedings across various courts for six years without contesting jurisdiction over his person, the Court deemed any objection to personal jurisdiction waived.
2. Jurisdiction over the case’s subject matter, the crime of abduction with consent, is conferred solely by law. The Court found that under an information for forcible abduction, the accused could be convicted of abduction with consent.
3. The requirement in Article 344 of the Revised Penal Code for the offense to be prosecuted upon a complaint by the offended party does not affect the courts’ jurisdiction. The Court interpreted Ester Ulsano and her mother’s actions as indicating their consent to prosecute for abduction with consent, given the original filing for forcible abduction.

**\*\*Doctrine:\*\***

- Jurisdiction over an accused is obtained either by their apprehension or their submission to the court's jurisdiction.
- Jurisdiction over the subject matter is conferred only by law and cannot be assumed based on the consent of the parties to a crime.
- Under an information for forcible abduction, the accused can legally be convicted of abduction with consent.

**\*\*Class Notes:\*\***

- **\*\*Jurisdiction over the person\*\*** is acquired upon apprehension or submission to the court.
- **\*\*Jurisdiction over the subject matter\*\*** must be conferred by law.
- **\*\*Prosecution of offenses\*\*** such as seduction, abduction, rape, or acts of lasciviousness requires a complaint by the offended party or their legal guardians, per Article 344 of the Revised Penal Code.
- The **\*\*doctrine of inclusion\*\*** underlines that an accused charged with forcible abduction can be convicted of abduction with consent, given the legal provisions and the facts of the case align.

**\*\*Historical Background:\*\*** This case underscores the complexities surrounding the legal categorizations of crimes involving coercion and consent, illustrating the judiciary's role in interpreting the letter of the law alongside the realities of societal and familial stances on honor, privacy, and justice. It represents a period in Philippine jurisprudence when the essence of crimes against chastity, including the importance of familial consent to prosecute, reflects traditional views on honor and morality.