

****Title:** Ernesto M. Fullero vs. People of the Philippines***

****Facts:**** In 1988, Ernesto M. Fullero, then Acting Chief Operator of the Iriga City Telecommunications Office, was accused of falsifying a public document—specifically, his Personal Data Sheet (PDS)—by falsely claiming he passed the Civil Engineering Board Exam. Despite Fullero’s denial and claim of forgery regarding his signature on the document, the Regional Trial Court (RTC) of Legazpi City found him guilty, a decision later upheld by the Court of Appeals and subsequently brought before the Supreme Court of the Philippines for review.

The case journeyed through the judicial system as follows: Fullero was initially arraigned and pled not guilty in 1998, followed by a trial on the merits resulting in his conviction by the Legazpi City RTC in 2003. His appeal to the Court of Appeals also resulted in an unfavorable decision in 2005, affirming his conviction in toto. Fullero then petitioned the Supreme Court for review on certiorari, asserting errors in the appreciation of evidence and legal jurisdiction of the trial court, among other concerns.

****Issues:**** The Supreme Court examined several key legal issues:

1. Whether sufficient evidence existed to prove Fullero actually committed the act of falsification.
2. Whether Fullero, assuming he filled out the PDS, was under any obligation to state accurate data therein, and if his actions demonstrated criminal intent.
3. The admissibility and proper identification of evidence presented by the prosecution.
4. Whether the Regional Trial Court of Legazpi City had jurisdiction over the case.

****Court’s Decision:****

1. On the sufficiency of evidence, the Court found the circumstantial evidence presented by the prosecution—including testimonial evidence familiar with Fullero’s signature and official records from the Professional Regulation Commission (PRC) and Civil Service Commission (CSC)—to be credible and sufficient to establish guilt beyond a reasonable doubt.
2. On the obligation to state accurate data and the presence of criminal intent, the Court held that wrongful intent to injure a third person is not an essential element of the crime of falsification of public documents. The primary offense is against public faith and the truth proclaimed in public documents.
3. On evidence admissibility, the Court ruled that the presented documentary evidence was admissible and relevant to the charge of falsification, with exceptions to the hearsay rule

applicable.

4. On jurisdiction, it determined that the RTC of Legazpi City correctly had jurisdiction over the offense based on the location of the offense as stated in the information and proven during the trial.

****Doctrine:**** The Supreme Court reiterated the doctrines related to the sufficiency of circumstantial evidence in criminal cases, the non-necessity of proving wrongful intent or injury in falsification of public documents, exceptions to the hearsay evidence rule, and jurisdictional principles based on the location of the commission of the offense.

****Class Notes:****

- Circumstantial Evidence: Requires more than one circumstance, facts from which inferences are derived must be proven, and the combination of all circumstances must produce conviction beyond a reasonable doubt.
- Falsification of Public Documents: The offense involves making untruthful statements in a public document, the offender having a legal obligation to disclose the truth, and the facts narrated are absolutely false. Wrongful intent to injure a third person is not required.
- Hearsay Evidence: Generally inadmissible except for specified exceptions such as entries in official records made in the performance of duty by a public officer.

****Historical Background:**** This case highlights the strict standards imposed by Philippine law on the integrity of public documents and the serious consequences of falsifying such documents. It underlines the judiciary's role in upholding public trust and accountability, particularly within the Civil Service.