

Title: Sheala P. Matrido vs. People of the Philippines

Facts:

Sheala P. Matrido, the petitioner, was employed as a Credit and Collection Assistant by Empire East Land Holdings, Inc. Her job entailed collecting payments from the company's real estate clients, issuing receipts, and remitting these payments to the company's office in Makati City. On June 10, 1999, she received a payment of P22,470.66 from Amante dela Torre, a buyer, but only remitted P4,470.66 to Empire East, pocketing the difference of P18,000. The discrepancy was evident in the official receipts, which Matrido had signed. Upon investigation by Empire East, it was discovered that Matrido had failed to remit other payments as well, leading to various complaints against her, including a Complaint-Affidavit filed on September 21, 2000, for estafa, which was later converted to a charge for qualified theft following a resolution by the Makati City Prosecution Office on November 15, 2000.

Despite Matrido's payment of P162,000 towards her admitted liability of P400,000 to Empire East in October 2000, the charge for qualified theft proceeded to trial at the Regional Trial Court (RTC) of Makati, Branch 56, leading to her conviction on December 13, 2004. The Court of Appeals affirmed this conviction on May 31, 2007, prompting Matrido to file a petition with the Supreme Court, primarily contesting the consistency of her charge with the allegations and evidence presented during trial.

Issues:

1. Did the appellate court err in affirming the RTC's decision convicting Matrido of qualified theft, despite her argument that the prosecution's evidence pointed towards estafa, thereby violating her right to be informed of the nature and cause of the accusation against her?

Court's Decision:

The Supreme Court upheld the appellate court's decision, affirming Matrido's conviction for qualified theft. It clarified that the nature of the offense is determined by the allegations in the Information, not by the evidence presented at trial or the technical name used by the prosecution. In Matrido's case, the Information sufficiently detailed the elements of qualified theft, including the unlawful taking of money without consent and with intent to gain, accomplished without violence or intimidation, and under grave abuse of confidence — all of which applied to Matrido's actions as detailed in the Information. The Court also discussed the nuances distinguishing theft from estafa, particularly focusing on the nature of possession of the property in question. Lastly, the Court modified the penalty imposed on Matrido, providing a precise determination consistent with the Revised Penal Code and the

Indeterminate Sentence Law.

Doctrine:

The distinction between estafa and theft primarily hinges on the offender's possession of the property. Theft, including its qualified form, can occur even with the offender's initial lawful possession of the property, provided the taking was without consent, with intent to gain, and without resorting to violence or intimidation. The nature and cause of the accusation against an accused are determined by the allegations within the Information, guiding the preparation of the defense and ensuring the accused's right to be informed.

Class Notes:

- **Qualified Theft Elements:** Taking of personal property, belonging to another, without consent, with intent to gain, accomplished without violence/intimidation or force, and under circumstances indicating grave abuse of confidence.
- **Juridical vs. Material Possession:** Juridical possession involves rights that can be defended against anyone, including the owner, whereas material possession is more about the physical control of the property.
- **Penalty Calculation:** The penalty for qualified theft is two degrees higher than that for simple theft, with adjustments for mitigating circumstances and applicable ranges under the Indeterminate Sentence Law.

Historical Background:

This case emphasizes the importance of accurately framing charges in criminal prosecutions within the Philippine legal system, reflecting on the judiciary's interpretation of criminal actions—whether as theft or estafa—based on nuances of possession and intent. Through such decisions, distinctions between various forms of misappropriation are clarified, aligning legal definitions with the evolving nature of employment and fiduciary relationships in modern society.