

Title: Felix O. Alfelor, Sr., et al. vs. The Honorable Bonifacio C. Intia, et al.

Facts: The petitioners, led by Felix O. Alfelor, Sr., faced a falsification charge related to the 1965 congressional elections in the second district of Camarines Sur, Philippines. Felix A. Fuentebella, who was proclaimed the winner of the election and subsequently became a respondent in this case, accused Alfelor and his companions of falsifying public or official documents contained in a ballot box from Parubcan, Camarines Sur. The alleged falsification occurred in Iriga, Camarines Sur, outside the territorial jurisdiction of the municipal court of Tigaon, Camarines Sur, where the charge was filed. The petitioners filed a motion to dismiss based on the lack of jurisdiction, asserting that the alleged crime occurred in Iriga. The municipal judge, respondent Bonifacio C. Intia, denied this motion, justifying his decision by considering falsification a continuing offense that occurred within his territorial jurisdiction. The denial of a subsequent motion for reconsideration by the petitioners led them to appeal to the Supreme Court through a petition for certiorari and prohibition.

Issues:

1. Whether the municipal court of Tigaon, Camarines Sur, presided over by respondent Judge Bonifacio C. Intia, had jurisdiction over a falsification charge for an act allegedly committed in another municipality, Iriga, Camarines Sur.
2. Whether falsification of public or official documents is considered a continuing offense that extends jurisdiction over such an offense to municipalities through which falsified documents have been transported.

Court's Decision:

The Supreme Court granted the petition for certiorari, reversed, and nullified the orders issued by Judge Intia, and enjoined him from taking any further action on the complaint for falsification, except to dismiss it. The Court clarified that jurisdiction in criminal actions is determined by the place where the criminal offense was committed, anchoring this determination on the Judiciary Act of 1948 and the Rules of Court. It explicitly rejected the notion that falsification is a continuing offense, citing previous rulings that established the crime of falsification is consummated when and where the falsification occurs, regardless of the use or transport of the falsified document.

Doctrine:

Jurisdiction in criminal cases is confined to offenses committed within the territorial limits of the court, as stipulated in Section 86 of the Judiciary Act and Section 14 of Rule 110 of

the Rules of Court. The place where the offense was committed is an essential element of jurisdiction. Falsification of a document is consummated at the moment and place of the falsification itself, irrespective of where the document is later transported or used, thus is not considered a continuing offense.

Class Notes:

1. Jurisdiction in criminal cases: determined by the place where the offense was committed.
2. Falsification of documents: considered consummated at the moment of falsification; not a continuing offense.
3. Essential statutes:
 - Judiciary Act, Section 86: Municipal courts have jurisdiction only over offenses committed within their territorial jurisdiction.
 - Rules of Court, Rule 110, Section 14: Criminal prosecutions should be instituted in the court of the municipality or province where the offense was committed or any of its essential ingredients took place.

Historical Background:

This case stems from the contentious 1965 elections in the second district of Camarines Sur, reflecting the intense political rivalries in the Philippines. The legal battle highlights the complexities of election-related offenses and jurisdictional challenges in prosecuting alleged election fraud, underlining the importance of clear legal precedents for future electoral disputes.