

Title:

Jose G. Garcia vs. Court of Appeals, People of the Philippines and Adela Teodora P. Santos:
A Case of Prescription in Bigamy

Facts:

Jose G. Garcia filed an affidavit of complaint against his wife, Adela Teodora P. Santos, for Bigamy, in addition to other charges, on August 28, 1991. Upon proceeding, he opted to pursue only the bigamy charge, leading to the filing of information on January 8, 1992, alleging Santos contracted a second marriage with Garcia in 1957 without the dissolution of her first marriage to Reynaldo Quiroca. Santos filed a motion to quash based on the argument of offense prescription, citing Garcia discovered her prior marriage in 1974, pushing the offense to prescribe by 1989. The trial court sided with Santos, granting the motion to quash based on a 15-year prescription period under Article 92 of the Revised Penal Code (RPC). Garcia's appeal hinged on his assertion that bigamy's prescription should start upon the state's discovery of the crime, the courts overlooking evidence presented outside the information, and Santos' international travel as interrupting the prescription period. The Court of Appeals upheld the trial court's decision. Garcia sought review from the Supreme Court, arguing similar points raised in his appellate challenge.

Issues:

1. Whether the prescription of bigamy should commence upon the discovery by the state rather than the offended party.
2. If the Court can consider matters outside the allegations in the information when resolving a motion to quash based on the prescription.
3. The conclusiveness of Garcia's own admissions regarding his knowledge of Santos' previous marriage for the prescription period.
4. The impact of Santos's international travel on the interruption of the prescription period.

Court's Decision:

The Supreme Court denied the petition, affirming the decision of the Court of Appeals. It ruled that:

1. The period of prescription for bigamy begins upon discovery by the offended party, the authorities, or their agents, with no distinction between public and private crimes in this context. Garcia, as the party harmed by the bigamy, qualifies as such an offended party.
2. The Court can consider evidence beyond the information's allegations in determining the motion to quash based on the prescription, supporting the legality of Santos' approach.
3. Garcia's admissions were significant in establishing when he discovered Santos's prior

marriage, rendering the offense prescribed by the time of the information's filing.

4. Santos' temporary travels abroad did not constitute an "absence from the Philippine Archipelago" that would interrupt the prescription period, as these were brief and she returned to the Philippines afterward.

Doctrine:

The Court reiterated the principle that the prescription period for crimes starts upon their discovery by the offended party, "the authorities, or their agents," and that the discovery by the state is not a precondition for such commencement, consistent with Article 91 of the Revised Penal Code. Furthermore, it was emphasized that the offended party in a criminal case includes the individual to whom the offender is civilly liable.

Class Notes:

- **Bigamy Prescription**: Begins upon discovery by the offended party, authorities, or their agents, not solely upon the State's discovery.
- **Evidence Beyond Information**: Allowed to support a motion to quash based on the prescription of the offense.
- **Admissions in Proceedings**: Can be determinative of when the prescription period commenced.
- **Absence Interruption**: Only substantial absence from the Philippine Archipelago interrupts the prescription period; brief international travels do not.

Historical Background:

This case illustrates the legal nuances of prosecuting bigamy in the Philippines, highlighting how personal admissions and actions long before legal proceedings can affect the outcome. It also underlines the prescriptive periods for crimes under the RPC and their implications for both the prosecution and defense, adding to the jurisprudence on how courts interpret the start and interruption of such periods.