

Title:

Lee Pue Liong a.k.a. Paul Lee vs. Chua Pue Chin Lee: A Philippine Supreme Court Decision on the Role of Private Prosecutors in Public Crimes

Facts:

Lee Pue Liong (petitioner), president of Centillion Holdings, Inc. (CHI), found himself entangled in internal corporate disputes with his siblings, including Chua Pue Chin Lee (respondent), a majority stockholder and treasurer of CHI. The disputes escalated on July 19, 1999, when the respondent and others barricaded themselves inside a CKC Group factory, preventing the petitioner and employees from entering.

Further complicating matters, on June 14, 1999, the petitioner filed a verified petition for the issuance of a new owner's duplicate copy of a lost Transfer Certificate Title (TCT) No. 232238, which covered a property owned by CHI. He claimed that the title was inadvertently lost and could not be found despite diligent efforts. The Regional Trial Court (RTC) initially granted this petition.

However, the respondent contested this in court, presenting the original TCT and claiming that the petitioner was fully aware of its location. Consequently, the RTC revoked its earlier order and sided with the respondent.

Alleging perjury, the respondent filed a Complaint-Affidavit against the petitioner, leading to Criminal Case Nos. 352270-71 CR for perjury. The Metropolitan Trial Court (MeTC) of Manila allowed the involvement of a private prosecutor, representing the respondent, alongside the public prosecutor. The petitioner contested this, arguing that as perjury was a crime against public interest, no private party was directly offended, thus a private prosecutor should not participate. The MeTC and later the Court of Appeals (CA) disagreed, upholding the involvement of the private prosecutor.

Issues:

1. Whether the CA erred in affirming the MeTC's allowance of a private prosecutor in a public crime like perjury, asserting that there exists a private offended party.
2. Whether the CA erred in supporting the respondent's right to intervene in the criminal case for perjury as a private complainant without CHI's authority.

Court's Decision:

The Supreme Court denied the petition, affirming the CA and MeTC's decisions. It held that the respondent, being a stockholder and treasurer impacted by the petitioner's actions, had

a direct interest in the outcome, making her an aggrieved party. The court emphasized that crimes, whether public or private, impact both the state and the direct victims. It clarified that the right of an offended party or a direct victim to participate in the prosecution of a crime through a private prosecutor is not limited to cases with civil liabilities but extends to securing the conviction of the offender.

Doctrine:

The Supreme Court reiterated the doctrine that in criminal cases, especially where civil action for recovery of civil liability is conjoined, the offended party or an entity/individual directly injured by the offense has the right to intervene in the prosecution of the offense. This holds true even if the case involves public crimes and regardless of whether there is civil liability involved.

Class Notes:

- **Key Elements**: Involvement of private prosecutors in criminal proceedings, definition and rights of “offended parties” in criminal cases, and the integration of civil liability with criminal actions.
- **Critical Statutory Provisions**: Articles 100, 183 of the Revised Penal Code; Sections 1, 12, and 16 of Rule 110, Section 1 of Rule 111, Revised Rules of Criminal Procedure.
- **Application**: The right of intervention by an offended party or directly injured entity/person through a private prosecutor is validated not only by the existence of civil liabilities but also by the direct impact of the offense on their legal interests.

Historical Background:

This case highlights the intricate interaction between corporate disputes and criminal law in the Philippines, showcasing how intra-corporate conflicts can extend beyond civil disputes into criminal litigation. It elucidates the broad interpretation of who can be considered an “offended party” in criminal cases and underscores the significance of ensuring that entities or individuals directly impacted by criminal actions can actively participate in seeking justice.