

Title: Saulo vs. People of the Philippines and Marsene Alberto

Facts:

Edwin L. Saulo, the owner of Yadoo Dynasty and Khumbmela Products, Inc. engaged in financial transactions involving the issuance of checks, which were later contested leading to legal battles across various levels of the Philippine judicial system. Marsene Alberto, initially employed by Saulo and subsequently involved in facilitation of loans to him, became the private respondent upon Saulo's initiation of legal complaints against her, alleging theft and falsification of several checks.

The legal journey began with Saulo's allegations of Estafa against Alberto, leading to the filing and subsequent dismissal of charges of Qualified Theft and Falsification of Commercial Documents due to insufficient evidence. Alberto retaliated by filing cases of Perjury and Violation of Batas Pambansa Bilang 22 (B.P. 22) against Saulo, based on the checks she facilitated or received in connection to the loans, and Saulo's allegations against her, deemed false.

Saulo's conviction on two counts of Violation of B.P. 22 and Perjury in the Metropolitan Trial Court (MeTC) of Pasig City was affirmed successively by the Regional Trial Court (RTC) of Pasig and the Court of Appeals (CA), with Saulo's petitions for reconsideration denied at each instance.

Issues:

1. Whether Saulo deliberately asserted falsehoods in his allegations against Alberto.
2. Whether Saulo could be convicted for violations of B.P. 22.

Court's Decision:

The Supreme Court held that factual determinations made by lower courts, particularly on the credibility of witnesses and the establishing of facts, were binding at the Supreme Court level absent any overlooked or misunderstood facts or circumstances. It found that the elements of Perjury were sufficiently established, including Saulo's deliberate assertion of falsehoods in his claims against Alberto.

For violations of B.P. 22, the Court noted that the elements for conviction were present and unchallenged. Saulo's issuance of checks without sufficient funds was established, as were the facts surrounding their dishonor and Saulo's failure to arrange for their payment upon notification. The Supreme Court also underscored the rule that an officer of a corporation cannot avoid personal liability for acts done under its name if the law is violated.

Doctrine:

1. The Supreme Court does not typically question factual findings of lower courts, especially concerning the credibility of witnesses, unless there is a clear oversight or misunderstanding of facts or circumstances.
2. The elements of Perjury under the Revised Penal Code are: (a) making a statement under oath on a material matter; (b) the statement is made before a competent officer authorized to receive and administer an oath; (c) a willful and deliberate assertion of falsehood; (d) and the sworn statement or affidavit is required by law or made for a legal purpose.
3. For violations of B.P. 22, essential elements include: (1) making, drawing, and issuing a check to apply for account or value; (2) knowing at the time of issuing that there are insufficient funds in or credit with the drawee bank; (3) subsequent dishonor of the check for insufficiency of funds or credit.

Class Notes:

- Perjury requires a willful and deliberate assertion of falsehood under oath, relevant to the legal inquiry.
- Violations of B.P. 22 hinge on the issuer knowing the check would bounce due to insufficient funds or credit, with the check subsequently dishonored for this reason.
- Corporate officers can be held personally liable for issuing worthless checks in violation of penal statutes, despite acting in the name of a corporation.

Historical Background:

This legal saga reflects the judicial processes involved in financial disputes revolving around the issuance of bounced checks and the allegations of perjury arising from subsequent litigation. It emphasizes the scrutiny placed on the veracity of statements made under oath in legal proceedings and the rigorous judicial mechanism in place for resolving disputes involving financial transactions and personal conduct within corporate activities