

Title: The People of the Philippines vs. Hon. Judge Hernando Pineda, et al.

Facts:

The case arose from five separate criminal cases filed against Tomas Narbasa, Tambac Alindo, and Rufino Borres before the Court of First Instance (CFI) of Lanao del Norte, charged as principals in four murder cases and one frustrated murder case. These charges stemmed from an incident on the night of July 29, 1965, in Puga-an, City of Iligan, where the accused allegedly fired weapons at the house of the Mendoza family, resulting in the death of Teofilo Mendoza and his three minor children, and wounding Valeriana Bontilao de Mendoza. Narbasa and Alindo sought the consolidation of the five cases into one, arguing that the incidents arose from the same episode and were motivated by a singular impulse. On May 13, 1966, Judge Hernando Pineda ordered the consolidation and dismissal of four cases, directing a singular information to be filed under Criminal Case 1246. The City Fiscal objected, emphasizing the distinct and separate nature of the crimes due to the use of multiple guns and the resultant multiple fatalities and injuries. Despite the objection, on May 31, 1966, the consolidation order was upheld by Judge Pineda. The decision was challenged in the Supreme Court (SC) via certiorari by the People of the Philippines, arguing that the judge's orders were issued without or in excess of jurisdiction and/or with grave abuse of discretion.

Issues:

1. Whether the consolidation of the five separate criminal cases into one, as ordered by Judge Pineda, is appropriate under the circumstances.
2. Whether the acts in question constitute a single complex crime or separate offenses.
3. The extent of discretion afforded to the prosecuting attorney concerning the filing of criminal cases.

Court's Decision:

The Supreme Court granted the writ of certiorari, setting aside Judge Pineda's orders for consolidation and declaring them null and void. The SC differentiated between a single criminal act resulting in multiple crimes and multiple distinct acts causing separate offenses. It was held that the acts committed by the respondents constituted separate and distinct offenses, each warranting individual indictments as initially filed by the City Fiscal. The SC highlighted the statutory and jurisprudential backing for treating the acts as distinct crimes, instructing the reinstatement of the five separate criminal cases for resolution.

Doctrine:

This case reiterates the doctrine that separate and distinct criminal acts resulting in harm to multiple victims are to be treated as separate offenses. It distinguishes between “delito compuesto” and “delito complejo” under Article 48 of the Revised Penal Code, emphasizing the requirement of a “singularity of criminal act” for the imposition of a single penalty for complex crimes.

Class Notes:

Key elements for consideration include:

- **Article 48 of the Revised Penal Code:** Understanding the distinction between complex crimes arising from a single act versus multiple acts.
- **Discretion of the Prosecuting Attorney:** The prosecuting attorney’s discretion in filing cases and determining the charges is paramount, barring instances of clear abuse of discretion.
- **Consolidation of Criminal Cases:** The conditions under which separate crimes, especially stemming from a series of actions involving multiple victims, should be maintained as separate charges versus consolidated into a single case.

Historical Background:

This case underscores the procedural intricacies and judicial discretion involved in criminal prosecutions, especially in instances of multiple related offenses. It highlights the balance between judicial economy and the right to a fair trial, reflecting on the broader legal principles governing criminal accountability and prosecutorial discretion within the Philippine legal system.