

Title: ****Villareal vs. Aliga****

Facts:

This case revolves around an incident on October 30, 1996, in Makati City, Philippines, involving Consuelo C. Aliga, an accountant for Dentrade Inc., who was charged with Qualified Theft through Falsification of Commercial Document. The charge alleged that Aliga, with grave abuse of confidence and intent for gain, falsified a United Coconut Planters Bank Check by altering the amount from P5,000.00 to P65,000.00 and subsequently encashing it for her own benefit, to the damage and prejudice of Dentrade Inc.

Upon arraignment on December 6, 1996, Aliga pleaded not guilty. The trial proceeded in the Regional Trial Court (RTC), which found Aliga guilty and sentenced her to 14 years and 8 months to 20 years of reclusion temporal. Aliga appealed the RTC decision to the Court of Appeals (CA), which reversed the RTC's decision based on the inadmissibility of Aliga's confession due to the absence of advice on her rights and the insufficiency of circumstantial evidence presented by the prosecution.

Dennis T. Villareal filed a petition for review on certiorari under Rule 45 of the Revised Rules of Civil Procedure to the Supreme Court, contesting the CA's decision. Villareal raised issues concerning the admissibility of Aliga's confession and the sufficiency of the prosecution's evidence.

Issues:

1. Whether the CA erred in declaring Aliga's voluntary admission of guilt as inadmissible based on speculative premises.
2. Whether the CA erred in finding the prosecution's evidence insufficient to overcome Aliga's presumption of innocence.

Court's Decision:

The Supreme Court dismissed Villareal's petition for lack of merit, affirming the CA's decision that acquitted Aliga. The Court clarified procedural missteps made by Villareal, notably filing the petition without the representation of the Office of the Solicitor General (OSG) and the inappropriateness of a review on certiorari under Rule 45 for questioning a judgment of acquittal, where a petition for certiorari under Rule 65 should have been utilized instead.

Doctrine:

The Court reiterated the principle that in criminal cases where the State is the offended

party, the authority to represent the State in appeals rests solely with the OSG. Additionally, it was highlighted that a judgment of acquittal can only be challenged through a petition for certiorari under Rule 65 on the ground of jurisdictional errors or grave abuse of discretion amounting to a lack or excess of jurisdiction, without placing the accused in double jeopardy.

Class Notes:

- Only the Solicitor General may represent the People of the Philippines in appealing criminal cases.
- A judgment of acquittal is final and cannot be appealed to prevent double jeopardy, except through a special petition for certiorari under Rule 65, focusing solely on jurisdictional issues or grave abuse of discretion by the court.
- Legal standing in filing petitions related to criminal cases is strictly regulated, emphasizing the segregation of powers and duties between the private complainant and the State.
- The principle of double jeopardy protects individuals from being tried for the same offense after an acquittal, emphasizing the finality of acquittals and the protection of individual rights against state power.

Historical Background:

This case exemplifies the procedural intricacies and limitations imposed on appeals in criminal law within the Philippines, particularly emphasizing the unique role of the Office of the Solicitor General in representing the state's interests in criminal proceedings and the sanctity of the principle of double jeopardy.