

Title: *Illuminada Batac v. People of the Philippines*

Facts:

Illuminada Batac faced charges for Estafa under Article 315, paragraph 2(d) of the Revised Penal Code (RPC), aspired by R.A. No. 4885, against complainant Roger L. Frias. It was alleged that Batac issued 14 post-dated checks totaling P103,500 without sufficient funds, leading to their dishonor with reasons marked as “ACCOUNT CLOSED.” Batac’s defense was that Erlinda Cabardo, not she, had issued these checks and refuted meeting or transacting with Frias. The trial at the Regional Trial Court (RTC) led to her conviction, which was later affirmed by the Court of Appeals (CA) with a modified penalty. Batac then escalated the matter to the Supreme Court via a petition for review under Rule 45 of the Rules of Court.

Issues:

1. Whether the petitioner, Illuminada Batac, was correctly identified and held liable for the act of issuing unfunded checks leading to Estafa under Article 315, paragraph 2(d) of the RPC.
2. Whether Batac’s issuance of the checks constituted estafa or should be considered under the Bouncing Checks Law (B.P. Blg. 22).
3. Questions on the proper interpretation of the elements of estafa under Article 315, paragraph 2(d) of the RPC particularly concerning the requirement of deceit and damage.

Court’s Decision:

The Supreme Court found no merit in Batac’s petition, underpinning the factual findings of the lower courts—RTC and CA—which positively identified Batac in the fraudulent transaction with Frias. The Court reiterated that Batac’s actions clearly constituted estafa as her issuance of the checks was both deceitful—having misrepresented the checks to be funded—and resulted in damage to Frias. The Court distinguished the crime of estafa from B.P. Blg. 22 violations, noting that fraud (deceit) and damage are crucial elements in the former. The penalty was adjusted based on the amendments embodied in R.A. No. 10951, yielding an indeterminate sentence.

- Deceit was evident as Batac had convinced Frias to accept the checks under the false pretense of having sufficient funds.
- Damage was substantiated by Batac’s failure to provide the promised funds upon the checks’ dishonorment.

Doctrine:

The case reiterated the legal standards for estafa under Article 315, paragraph 2(d) of the RPC, emphasizing the crucial role of deceit and damage in constituting the crime. It underscored the distinction between the elements required for estafa and those for violations under the Bouncing Checks Law (B.P. Blg. 22).

Class Notes:

- Estafa under Article 315, paragraph 2(d) of the RPC requires (1) issuance of a check in payment of an obligation, (2) knowledge at the time of issuance that the offender had no funds or insufficient funds in the bank, and (3) the payee being defrauded as a result.
- Deceit and damage are essential elements for estafa, but not for B.P. Blg. 22 violations.
- The difference between estafa and B.P. Blg. 22 offenses includes the necessity of deceit and damage in the former and the focus on the act of issuing a dishonored check in the latter.

Historical Background:

This case sheds light on the judicial interpretation of estafa involving bouncing checks in the Philippine legal system, particularly in the context of more recent legislative amendments affecting penalties. The decision provides clarity on the distinguishing aspects between crimes of deceit involving financial transactions and mere issuance of bouncing checks, reinforcing the importance of representing facts truthfully in financial dealings.