

Title:

****People of the Philippines vs. Ruben Sison: The PCIB Qualified Theft Case****

Facts:

Ruben Sison, a former Branch Operation Officer at the Philippine Commercial International Bank (PCIB), Luneta Branch, faced charges for Qualified Theft under Article 310 of the Revised Penal Code. The accusation stemmed from his unauthorized withdrawal of PHP 6,000,000 during January 24, 1992, to February 13, 1992. The case unfolded following a detailed legal and procedural trajectory leading to his conviction by the Regional Trial Court (RTC) of Manila, subsequently upheld by the Supreme Court.

Starting his career at PCIB in 1977, rising to Assistant Manager in 1987, and becoming the Branch Operation Officer in 1989, Sison had direct supervision over the branch's crucial functions, including the cash vault custody. The case against him was initiated by an Affidavit-Complaint on April 23, 1992, leading to a shift from initial estafa charges to qualified theft by the City Prosecutor of Manila, grounded in his position's inherent access and authority.

Despite attempts to escape arrest, Sison was detained in June 1993, following several warrants and an Urgent Ex-Parte Motion for the Issuance of Writ of Preliminary Attachment. His trial saw testimony from various bank employees outlining the methodical exploitation of his role to divert funds through fictitious account activities and direct cash withdrawals.

Issues:

1. The validity of convicting based purely on circumstantial evidence.
2. The establishment of Sison's guilt beyond a reasonable doubt for Qualified Theft.

Court's Decision:

The Supreme Court dismissed Sison's appeal, affirming the trial court's decision on several grounds. Firstly, circumstantial evidence, when sufficiently interconnected, was deemed competent for conviction, establishing a coherent narrative of abuse of position by Sison to perpetrate the theft.

The case hinged on establishing that Sison had unique access and control over bank operations enabling the unauthorized withdrawal and transfer of funds. Several bank employees' testimonies, together with the implausibility of Sison's defense and his subsequent unexplained disappearance, contributed to the Court's decision. Each circumstantial element, from unauthorized account modifications to Sison's sole vault

access and flight upon discovery, underscored a premeditated scheme to defraud PCIB, satisfying the threshold for conviction beyond reasonable doubt.

Doctrine:

The Supreme Court reiterated the principle that circumstantial evidence could underpin a conviction for qualified theft, provided it delineates a logical and unbroken chain of events pointing to the accused's guilt beyond reasonable doubt. It also underscored the concept of "grave abuse of confidence" under Qualified Theft, emphasizing the aggravation due to violation of fiduciary trust.

Class Notes:

- **Qualified Theft (Article 310, RPC):** Requires the presence of (1) taking of personal property without consent, (2) belonging to another, (3) with intent to gain, (4) done without violence or intimidation against persons or force upon things, and (5) either committed by a domestic servant or with grave abuse of confidence.
- **Circumstantial Evidence (Sec. 4, Rule 133, ROC):** Can support a conviction if it meets three criteria: there's more than one circumstance, facts from which inferences are derived are proven, and the combination of all circumstances leads to a moral certainty of guilt beyond reasonable doubt.
- **Doctrine of Grave Abuse of Confidence:** Explores how certain positions of trust elevate the severity of theft charges when those trusted roles are exploited to commit the crime.

Historical Background:

This case provides deep insights into the application of Philippine law on theft, particularly on how trusted bank officials can face elevated charges when they abuse their positions. It demonstrates the legal system's adaptability in confronting white-collar crime through circumstantial evidence, reflecting evolving approaches to justice and accountability in the financial sector.