

Title:

Adina B. Manansala v. People of the Philippines, G.R. No. 213366

Facts:

On May 31, 1999, Kathleen L. Siy, the Vice President for Finance at Urban Finance and Leasing Corporation (UMC), instructed her secretary, Marissa Bautista, to withdraw ₱38,000.00 from her personal bank accounts via ATM. When the ATM was offline, Bautista took the money from UMC's petty cash without informing Siy. On June 9, 1999, Violeta Q. Dizon-Lacanilao, UMC's Finance Manager, informed Siy of an unliquidated cash advance of ₱38,000.00 recorded by Adina B. Manansala, UMC's Petty Cash Custodian. Siy then reimbursed the amount via two checks, leading Lacanilao to instruct Manansala to revise the petty cash replenishment report, excluding the entry relating to Siy's alleged cash advance. However, Lacanilao later ordered Manansala to re-insert and falsify the entry.

This led to Siy's termination from UMC for alleged misuse of company funds. Subsequently, Siy filed criminal charges against Lacanilao and Manansala for Falsification of Private Documents. The Metropolitan Trial Court (MeTC) of Makati City found both defendants guilty. While Lacanilao did not appeal, Manansala did, asserting she acted under her superior's orders out of fear for her job.

Procedural Posture:

1. **Metropolitan Trial Court (MeTC) Decision (October 27, 2010)**:

Found both Manansala and Lacanilao guilty of falsification, imposing imprisonment and fines. Manansala's motion for reconsideration was denied on January 31, 2011.

2. **Regional Trial Court (RTC) Decision (October 20, 2011)**:

Affirmed the MeTC's decision.

3. **Court of Appeals (CA) Decision (April 16, 2014)**:

Upheld the RTC's decision. Manansala's motion for reconsideration was denied on October 7, 2014.

4. **Supreme Court (SC)**:

Manansala filed a petition for review contesting her conviction based on procedural and substantive grounds.

Issues:

1. **Whether the CA correctly affirmed Manansala's conviction for Falsification of Private

Documents.**

2. **Whether the mitigating circumstance of “acting under an impulse of uncontrollable fear” was correctly applied in favor of Manansala.**

Court’s Decision:

Affirming Conviction:

- The SC affirmed Manansala’s conviction aligning with the earlier findings of the MeTC, RTC, and CA. It held that the prosecution established beyond reasonable doubt that Manansala falsified the petty cash report by inserting untruthful statements about a cash advance by Siy, which led to Siy’s wrongful termination.

Mitigating Circumstance:

- The SC ruled that the MeTC erred in appreciating the circumstance of “acting under an impulse of uncontrollable fear” in Manansala’s favor. It clarified that this is not a mitigating but an exempting circumstance under Article 12 (6) of the Revised Penal Code, requiring a real, imminent threat, not fulfilled in this case as Manansala’s fear of job loss did not meet the threshold of an uncontrollable fear inducing well-grounded apprehension of death or serious bodily harm.

Doctrine:

- **Falsification of Private Documents:** Consistent with Article 172 (2) and Article 171 (4) of the Revised Penal Code, falsification includes making untrue statements in private documents leading to prejudice against a third party.
- **Impulse of Uncontrollable Fear:** Discerning between mitigating and exempting circumstances, which necessitates imminent threat or fear.

Class Notes:

1. **Elements of Falsification of Private Documents (Article 172 (2), RPC):**
 - Act of falsification (except Article 171 (7))
 - Executed in a private document
 - Resulted or intended to result in damage to a third party
2. **Elements of Falsification under Article 171 (4), RPC:**
 - Untruthful statements in public documents
 - Legal obligation to disclose truth
 - Statements are absolutely false
3. **Impulse of Uncontrollable Fear (Article 12 (6), RPC):**

- Existence of uncontrollable fear
- Real and imminent fear
- Fear of injury is greater or equal to offense committed

Historical Background:

During the late 1990s and early 2000s, corporate governance in the Philippines faced scrutiny due to various high-profile cases of fraud and financial misdeeds. This period saw heightened regulatory and public attention towards ethical standards and accountability within corporations, stressing lawful adherence by finance and management departments. The case of Adina B. Manansala emerges from this backdrop, underscoring the judiciary's role in upholding transparency and fairness in corporate practices.