

Title

People of the Philippines v. Belen Mejares y Valencia, G.R. No. 226729

Facts

- **May 24, 2012**: An Information was filed against Belen Mejares y Valencia (Mejares), charging her with qualified theft of cash and jewelry totaling PHP 1,556,308.00 from her employer, Jacqueline Suzanne Gavino y Aquino (Jackie).
- **May 22, 2012**: Alleged day of the theft.
- **1:00 p.m.**: Raquel Torres (household helper) notices Mejares' unusual demeanor after receiving a phone call.
- **1:30 p.m.**: Mejares, seen by security guard Pedro Garcia with a green bag, leaves the condominium using her employer's car.
- **3:00 p.m.**: Mejares returns to the condominium.
- **4:00 p.m.**: Jackie calls Torres, leading to suspicion as Jackie sounded normal, contrary to Mejares' claims of an accident.
- **Prosecution's Case**:
 - **Five witnesses**:
 - **Raquel Torres**: Noted Mejares' suspicious behavior and recounts the incident.
 - **Jackie Gavino**: Denies having a secretary named Nancy and any accident.
 - **Bonifacio Baluyot**: Driver who took Mejares to Greenhills and witnessed her carrying a green bag.
 - **Pedro Garcia**: Security guard who tried to prevent Mejares from leaving without a gate pass.
 - **PO3 Clifford Hipolito**: Investigating officer who took Mejares' statement admitting awareness of the dugo-dugo gang.
- **Defense**:
 - **Mejares**: Claimed she was a victim of the dugo-dugo gang, acted on instructions from supposed calls from Jackie and someone named Nancy.
- **February 6, 2014**: Regional Trial Court (RTC) found Mejares guilty and sentenced her to reclusion perpetua, also to pay PHP 1,056,308 in damages.
- **July 30, 2015**: Court of Appeals affirmed the RTC's decision in toto.

- **January 23, 2017**: Supreme Court noted parties' manifestations in lieu of supplemental briefs.

Issues

1. Did the prosecution prove the guilt of Mejares beyond reasonable doubt for qualified theft?
2. Was the penalty imposed appropriate under the Revised Penal Code and subsequent legislative amendments?

Court's Decision

First Issue: Guilt Beyond Reasonable Doubt

- **Intent to Gain Presumed**: Intent to gain or animus lucrandi is presumed from the unlawful taking of property. The court found that Mejares' actions - breaking into the drawer and retrieving valuables - demonstrated this intent.

- **Actions Inconsistent with Innocence**:

- Surreptitiously handled calls regarding Jackie's alleged accident.
- Ignored warnings about the dugo-dugo gang.
- Persisted in leaving the condominium with the valuables.
- Previous employment duration (1 year) indicated a trust relationship.

Second Issue: Penalty Adjustment under Republic Act No. 10951

- **Retroactive Application**: Republic Act No. 10951 adjusted the penalties and values of property related to crimes such as theft, which applies retroactively to benefit the accused.

- **Insufficient Evidence on Valuation**:

- Correct valuation of stolen items not adequately proven.
- Court applied the minimum penalty under Article 309(6), as amended.

- **Application of Indeterminate Sentence Law**:

- Considering minimum and maximum ranges of arresto mayor and prision correccional, the sentence was adjusted.
- Mejares already served time beyond the adjusted sentence, mandating her release.

Doctrine

1. **Intent to Gain in Theft**: Intent to gain is presumed from the act of unlawful taking.

2. **Qualified Theft by Domestic Servants**: Increases penalties by two degrees under Article 310 of the Revised Penal Code.
3. **Retroactive Effect of Penalty Adjustments**: New laws reducing penalties apply retroactively if more favorable to the accused (Republic Act No. 10951).

Class Notes

- **Elements of Qualified Theft** (Article 310 of the RPC):
 - Taking of personal property.
 - Property belonging to another.
 - Intent to gain.
 - Without the owner's consent.
 - Without using force, violence, or intimidation.
 - With grave abuse of confidence or by a domestic servant.
- **Key Statutory Provisions**:
 - **Article 308**: Defines theft and its elements.
 - **Article 310**: Specifies increased penalties for qualified theft.
 - **Republic Act No. 10951**: Adjusts monetary thresholds for penalties and applies retroactively.

Historical Background

- The case contextualizes the evolving nature of penal laws in the Philippines.
- The Retroactive application of laws like Republic Act No. 10951 demonstrates the judiciary's adaptive approach to ensure justice remains fair and relevant according to contemporary economic conditions.

This case underscores the judiciary's balance between maintaining rigorous legal standards while being responsive to legislative reforms aimed at fostering a humane justice system.