

Case Brief: Alonto vs. People of the Philippines

****Title:****

Angelina Zabala Alonto vs. People of the Philippines, G.R. No. 145516, 487 Phil. 137 (1999).

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****Facts:****

1. ****Initial Transactions:****

- Between December 5-15, 1990, Angelina Zabala Alonto purchased various pieces of jewelry from Violeta E. Tizon, signing acknowledgment receipts for each transaction.
- As partial payment, Alonto issued a Bank of the Philippines Islands (BPI) check dated December 13, 1990, which was dishonored due to a closed account, leading Tizon to file a criminal complaint.

2. ****First Criminal Cases Filed and Desistance:****

- Criminal complaints for estafa and violation of Batas Pambansa Blg. 22 (B.P. 22) were filed but later dismissed after Tizon executed an "Affidavit of Desistance" following Alonto's promise to settle her obligations.

3. ****Issuance of Postdated Checks:****

- On January 5, 1992, Alonto issued three postdated BPI checks, each worth P25,000, to cover the remaining P75,000 owed to Tizon. These checks, dated February 5, 1992, March 5, 1992, and April 5, 1992, were again dishonored for the reason of "account closed."

4. ****Second Criminal Cases Filed:****

- Three new Informations for violation of B.P. 22 were filed in the RTC of Quezon City.

5. ****Trial Court Proceedings:****

- RTC of Quezon City found Alonto guilty of three counts of B.P. 22, sentencing her to one year of imprisonment per count, indemnifying Tizon P75,000, and paying a fine of P25,000.

6. ****Court of Appeals and Issues Raised:****

- The conviction was affirmed by the Court of Appeals. Alonto's motion for reconsideration was denied. The appeals claimed errors such as violation of double jeopardy, lack of jurisdiction, improper evidence admission, and contention on facts not constituting an offense.

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****Issues:****

1. ****Denial of Motion for Reconsideration:****

- Whether the denial of Alonto's motion for reconsideration by the Court of Appeals was proper.

2. ****Double Jeopardy:****

- Whether Alonto's conviction violated her right against double jeopardy.

3. ****Jurisdiction:****

- Whether the RTC of Quezon City had jurisdiction over the case despite the jurisdictional changes under Republic Act No. 7691.

4. ****Admission of Evidence:****

- Whether the exhibited documents and checks presented as evidence were properly authenticated and admitted.

5. ****Conclusions of Facts:****

- Whether the facts alleged in the Informations sufficiently constituted an offense under B.P. 22.

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****Court's Decision:****

1. ****Denial of Motion and Affirmation of Conviction:****

- The Supreme Court found no sufficient reason to reverse the denial of the motion for reconsideration and upheld the Court of Appeals' decision. The elements of B.P. 22 were sufficiently proven by the prosecution, including Alonto's knowledge of insufficient funds when issuing the checks.

2. ****Double Jeopardy:****

- The Supreme Court ruled that double jeopardy was inapplicable because the initial cases filed were different from the subsequent offenses charged and the latter issuance of checks constituted new and separate offenses.

3. ****Jurisdiction Validity:****

- The Supreme Court upheld the jurisdiction of the RTC of Quezon City as it had acquired jurisdiction before the effectivity of R.A. No. 7691 and continued to exercise it until the final determination, per established legal principles.

4. **Evidence Admission:**

- The Court affirmed the admissibility of the prosecution's exhibits, noting that proper identification and testimony regarding the acknowledgment receipts and checks were provided by witnesses, satisfying evidentiary requirements under Rule 132 of the Rules of Court. However, due to a discrepancy in one check date, Alonto's conviction on the third count was reversed.

5. **Constituent Facts for Offense:**

- The Supreme Court determined that the prosecution had sufficiently proven that the elements of B.P. 22 were present in the issuance of the checks, including knowledge of insufficient funds and subsequent dishonor due to a closed account.

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Doctrine:

- **B.P. 22 Violations:**

- "The law does not distinguish whether a check was issued in payment or as a guarantee. The issuance of a bouncing check, whether for payment or as a guarantee, constitutes an offense under B.P. 22 if the check is subsequently dishonored."

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Class Notes:

1. **Key Elements of B.P. 22 Violation:**

- Issuance of a check.
- Knowledge of insufficient funds at issuance.
- Subsequent dishonor of the check due to insufficiency or account closure.

2. **Double Jeopardy Elements:**

- Previous trial must have involved the same offense.
- Valid final judgment or dismissal must be present.
- Same accused must face the charges.

3. **Jurisdiction Principle:**

- Jurisdiction is not divested by new legislation unless explicitly intended for pending actions.

Relevant Statutes:

- **B.P. Blg. 22, Section 1:** Outlines offense elements for issuing bounced checks.
- **Section 20, Rule 132, Rules of Court:** Mechanism for authenticating documentary evidence.

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Historical Background:

- **Batas Pambansa Blg. 22 Introduction:**
- Enacted to curb the incidence of bouncing checks amidst rampant misuse, largely to foster trust in commercial transactions in the Philippines.
- **Estafa and Check Issuance Provisions:**
- Check issuance tied to estafa prevention (fraudulent acts), with B.P. 22 complementing the Revised Penal Code provisions on deceit and fraud in financial dealings.