

Title: People of the Philippines vs. Jose Buan, G.R. No. L-22980

Facts:

1. **July 23, 1962**: Jose Buan was driving a passenger bus of La Mallorca Company along MacArthur Highway, Guiguinto, Bulacan. His alleged negligence caused a collision with Sergio Lumidao's passenger jeep, which left the jeep damaged and its passengers injured.
2. **Damages and Injuries**:
  - Six passengers sustained slight physical injuries needing medical attention for 5-9 days.
  - Three passengers suffered serious bodily injuries requiring treatment for 30-45 days.
  - The jeep incurred damages amounting to P1,395.00.
3. **First Charge and Acquittal**:
  - **Charge**: Buan was charged with slight physical injuries through reckless imprudence in the Justice of the Peace Court of Guiguinto.
  - **Trial and Acquittal**: He was tried and acquitted on December 16, 1963.
4. **Second Charge**:
  - Before his acquittal, the Provincial Fiscal of Bulacan filed an information in the Court of First Instance for serious physical injuries and damage to property through reckless imprudence. Both charges stemmed from the same highway collision.
5. **Motion to Quash**: Upon arraignment in the Court of First Instance, Buan's counsel moved to quash the charges on grounds of double jeopardy, citing his previous acquittal.
  - The prosecution opposed the motion.
  - The Court denied the motion and Buan's subsequent motion for reconsideration.
6. **Appeal**: Buan appealed the decision to the Supreme Court.

Issues:

1. **Double Jeopardy**: Whether the second prosecution for serious physical injuries and damage to property through reckless imprudence subjects the appellant to double jeopardy, considering his previous acquittal for slight physical injuries through reckless imprudence.

Court's Decision:

1. **Double Jeopardy Application**: The Supreme Court ruled that the lower court erred in not dismissing the information for serious physical injuries and damage to property through reckless imprudence.
2. **Rationale**: The essence of the quasi-offense under Article 365 of the Revised Penal Code is the negligent act, not its outcomes. The negligent act is singular, regardless of its consequences (whether affecting one or several persons). Thus, Buan could not face multiple prosecutions for a single act of recklessness.

3. **Precedents Cited**:

- *People vs. Silva*: Acquittal for slight physical injuries through reckless imprudence barred subsequent prosecution for homicide through reckless imprudence.
- *People vs. Diaz*: Dismissal for reckless driving barred a second information of damage to property through reckless imprudence.
- *People vs. Belga and Yap vs. Lutero*: Multiple charges resulting from a single imprudent act cannot be separately prosecuted.

4. **Spanish Jurisprudence**: Consistent rulings state that a single negligent act causing diverse results still constitutes one offense.

**Doctrine**:

- **Single Negligent Act Doctrine**: In cases of criminal negligence under Article 365 of the Revised Penal Code, the negligent act itself is penalized rather than the results of the act. Multiple consequences from a single act do not create multiple offenses.

Class Notes:

- **Key Elements**:
  - Negligence must be the central act.
  - The gravity of the consequences only affects the penalty, not the nature of the offense.
  - Double jeopardy applies if an individual is tried or acquitted for the same negligent act.
- **Relevant Legal Statutes**: Article 365, Revised Penal Code of the Philippines.
- “Reckless imprudence consists of voluntary, but without malice, doing or failing to do an act from which material damage results by reason of inexcusable lack of precaution ...”

Historical Background:

- **Context**: This case illustrates the evolution and consistent affirmation of the interpretation of Article 365, establishing the principle that a single negligent act cannot lead to multiple prosecutions. The decision underscores the protection against double jeopardy provided by the Constitution in the backdrop of evolving traffic conditions and vehicular laws in the 1960s Philippines. The case draws from and reinforces principles set in earlier local and Spanish legal precedents, emphasizing the indivisibility of a negligent act regardless of the number or nature of its consequences.