

People of the Philippines vs. Jesus L. Crisostomo

Citation: 116 Phil. 200

Facts:

1. **Alleged Crime:** On September 3, 1959, Jesus L. Crisostomo was charged with estafa under Article 316, paragraph 2 of the Revised Penal Code.
2. **Incident:** On or about September 16, 1946, Crisostomo sold a parcel of land in Malolos, Bulacan to Teodoro Faustino and Regina Pangan for P15,000.00, falsely representing that the property was free from liens when it was actually mortgaged to Antonio Villarama.
3. **Discovery of Fraud:** The spouses only discovered the mortgage in 1953 after the property was sold at public auction following foreclosure proceedings against Crisostomo.
4. **Legal Action:** The accused filed a motion to quash the information on October 18, 1959, arguing that the offense had prescribed.
5. **Trial Court Decision:** On November 21, 1959, the Court of First Instance of Bulacan ruled in favor of the accused, quashing the charge based on the determination that the offense prescribed in five years, starting from 1946 or 1953 at the latest.
6. **Appeal:** The prosecution appealed, focusing on the length of the prescriptive period for the crime.

Issues:

1. **Primary Legal Issue:** Whether the crime of estafa under Article 316, paragraph 2 of the Revised Penal Code prescribes in five years (penalty of arresto mayor) or fifteen years (penalty of a fine exceeding P6,000).
2. **Calculation of Prescription:** Determining if the fine imposed in conjunction with arresto mayor should be considered in calculating the prescriptive period as per Article 26 of the Revised Penal Code.
3. **Application of Related Jurisprudence:** Whether the Supreme Court's ruling in *People v. Basalo* concerning the classification of fines should apply in this case, which involved both penalties (arresto mayor and a substantial fine).

Court's Decision:

1. **Analysis of the Penalties:** The Court dismissed the trial court's interpretation, asserting that when a penalty includes both imprisonment and a fine, the higher penalty should be the basis for determining the prescriptive period.
2. **Precedents and Statutes:** Citing the precedent in *People v. Basalo* and interpreting Articles 26 and 90 of the Revised Penal Code, the Court held that fines imposed in

conjunction with terms of imprisonment are not subordinate but are integral components of the penalty.

3. **Classification of Fines:** Given that the fine in this case exceeds P6,000, it is classified as afflictive and the prescriptive period is fifteen years.
4. **Prescriptive Period of the Crime:** Since the information was filed within fifteen years of either the date of the fraudulent sale (1946) or the discovery of the fraud (1953), the crime had not prescribed.
5. **Outcome:** The Supreme Court reversed the trial court's order and remanded the case for proper proceedings.

Doctrine:

The legal doctrine established in this case is that when an offense under the Revised Penal Code is punishable by both imprisonment and a fine, the higher penalty should be utilized to determine the prescriptive period. Specifically, if a fine exceeds P6,000.00, it is considered an afflictive penalty thereby extending the prescription period to fifteen years.

Class Notes:

- **Estafa under Article 316, Revised Penal Code:** Involves defrauding another by disposing of encumbered real property.
- **Article 26, Revised Penal Code:** Defines fine classifications as afflictive, correctional, or light, affecting their application in prescription of offenses.
- **Article 90, Revised Penal Code:** Describes the prescriptive periods for crimes based on the penalties involved, emphasizing the highest penalty when multiple penalties are imposed.
- **Precedent Application:** The ruling in *People v. Basalo* is crucial for determining the prescriptive period when fines and imprisonment are involved.
- **Important Principles:**
 - **Compound Penalties:** The highest penalty in a compound penalty determines the prescriptive period.
 - **Non-Subordination of Fines:** When fines are imposed alongside imprisonment, they are not subordinate but are integral components of the penalty.

Historical Background:

This case offers context on how post-World War II property frauds were addressed by Philippine courts, reflecting the legal system's efforts to clarify and enforce prescriptive periods for financial crimes. The decision harmonizes jurisprudence regarding the treatment of fines and reinforces the judiciary's commitment to prosecuting economic offenses within

reasonable time limits.