

Title: Victor Que vs. People of the Philippines and Intermediate Appellate Court (238 Phil. 155)

Facts:

Victor Que, the petitioner, was convicted by the Regional Trial Court (RTC) of Quezon City for violating Batas Pambansa Blg. 22 (BP 22) on two counts for issuing bouncing checks. Que contended that he issued the dishonored checks merely as a guarantee for purchases made by Powerhouse Supply, Inc., where he served as Manager. When sued for civil liability by the complainant in Civil Case No. Q-32445, the petitioner admitted that the transactions and issuance of the checks took place at Francis Hill Supply in Quezon City.

Que elevated his conviction to the Intermediate Appellate Court (IAC), arguing that the RTC erred in sustaining jurisdiction as an essential element of the crime, the place of issuance, was allegedly absent. The IAC affirmed the RTC's judgment.

Subsequently, Que sought a review by certiorari from the Supreme Court, which initially dismissed the petition through a minute resolution for "lack of merit." Que then filed a Motion for Reconsideration, reiterating the erroneous jurisdictional claims and voicing concerns over the summary dismissal of his petition.

Issues:

1. Whether the RTC of Quezon City had jurisdiction over the case.
2. Whether the checks were issued as mere guarantees and the legal implications under BP 22.
3. Whether the Supreme Court's dismissal by minute resolution was procedurally sound.

Court's Decision:

1. ****Jurisdiction****: The Supreme Court upheld the jurisdiction of the RTC of Quezon City. It relied on Section 10 and 15(a) of Rule 110 of the New Rules of Court, emphasizing that the place of issuance (Quezon City) was determinative and well-supported by the petitioner's admissions in civil proceedings.
2. ****Issue of Guarantee Checks****: The court rejected Que's argument that the checks were issued merely as guarantees and therefore should not attract criminal liability under BP 22. The Supreme Court reiterated established jurisprudence that BP 22 applies irrespective of whether the checks were issued for an obligation or merely as a guarantee, highlighting the categorical legislative intent to punish the issuance of worthless checks to restore the credibility of such financial instruments.

3. **Minute Resolution's Validity**: Addressing procedural concerns, the Supreme Court validated its use of a minute resolution to dismiss the petition. It referenced *In Re: Almacén*, underscoring that a petition for review by certiorari is discretionary, not a matter of right, and hence can be summarily denied without a detailed explanation, especially when the facts and legal context are sufficiently elucidated by lower court rulings.

Doctrine:

1. **Jurisdiction in BP 22 Cases**: The place where the check was issued, as indicated by admissions and evidence, determines jurisdiction.
2. **Mere Issuance vs. Purpose of Check**: BP 22 covers all issued checks, irrespective of whether issued as payment or guarantee, reinforcing the intent to penalize indiscriminately to prevent misuse of checks.
3. **Discretionary Nature of Certiorari**: The Supreme Court maintains the discretion to dismiss a petition for review without detailed reasoning if it's clear that the lower courts have thoroughly addressed the facts and legal points.

Class Notes:

- **Key Legal Elements of BP 22**: Jurisdiction tied to the place of issuance; criminal liability established regardless of check's intended purpose.
- **Procedural Posture**: Review petitions are discretionary and can be denied through minute resolutions without elaborative reasons.
- **Statutory Provisions**: Secs. 10 and 15(a), Rule 110 of the New Rules of Court; legislative background of BP 22 underscoring blanket applicability to all issued checks regardless of intent.

Historical Background:

At the time of the case, Batas Pambansa Blg. 22 was a relatively recent legislation aimed at addressing a prevalent issue with bouncing checks, intended to restore public confidence in the banking system and financial transactions. The case underscored the rigor of BP 22 by affirming its broad application and reinforced judicial procedures around the essence and jurisdiction of criminal actions involving financial instruments. This case is pivotal in illustrating judicial interpretation and enforcement trends in Philippine financial law during the late 20th century.