

Title:

****Felilibeth Aguinaldo and Benjamin Perez vs. Reynaldo P. Ventus and Jojo B. Joson****

Facts:

This case involves a complaint filed on December 2, 2002, by Reynaldo P. Ventus and Jojo B. Joson against Felilibeth Aguinaldo and Benjamin Perez for estafa (fraud). The private respondents accused the petitioners of convincing them in March and April 2002 to part with PHP 260,000 under false pretenses. Aguinaldo allegedly pledged two motor vehicles as collateral, which she claimed to own but actually belonged to Levita De Castro of LEDC Rent-A-Car.

Key procedural steps:

1. ****January 15, 2003****: Perez denied the accusations in a Counter-Affidavit, claiming his role was limited to introducing Aguinaldo to the respondents.
2. ****January 22, 2003****: Respondents filed a Reply-Affidavit, asserting Perez presented registration documents.
3. ****January 29, 2003****: Perez's Rejoinder confirmed respondents were aware the vehicles were leased.
4. ****February 25, 2003****: Assistant City Prosecutor Renato Gonzaga recommended indicting the petitioners, noting Aguinaldo's non-appearance and lack of controverting evidence.
5. ****July 16, 2003****: Criminal Information for estafa filed in the RTC of Manila (Criminal Case No. 03-216182).
6. ****July 31, 2003****: Perez was arrested and had bail reduced; petitioners filed an urgent motion to recall/quash arrest warrants, leading the court to defer proceedings.
7. ****February 27, 2004****: Petitioners sought DOJ review for case dismissal.
8. ****March 15, 2004****: RTC directed arrest of Aguinaldo and scheduled arraignment.
9. ****April 16, 2004****: Arraignment deferred by RTC upon petitioners' request.
10. ****June 23, 2004****: De Castro moved to reinstate the case (though not a party to it), opposed by petitioners.
11. ****May 16, 2005****: RTC reinstated the case against Aguinaldo and issued arrest warrants based on DOJ's resolution in a related but separate case.
12. ****August 23, 2005****: RTC denied petitioners' motion to quash the warrant and set arraignment.

Issues:

Petitioners raised three main issues:

1. Whether the RTC erred in reinstating the case and issuing an arrest warrant based on a

motion filed by a non-party (De Castro).

2. Whether procedural rules on suspending arraignment (limiting to 60 days) could be relaxed in this circumstance due to pending DOJ review.
3. Whether filing the Information was premature as petitioners had not exhausted their motion for reconsideration rights.

Court's Decision:

The Supreme Court analyzed and resolved the issues as follows:

1. Motion Filed by Non-Party:

The Court acknowledged the propriety of the petitioners' claim—De Castro was not a complainant in the estafa case but merely a witness. Hence, her motion to reinstate was without merit. However, the issue did not affect the RTC's eventual resolution of the case as long as the proper parties were then taking rightful legal steps.

2. Suspension Period of 60 Days for Arraignment:

The Court disagreed with the petitioners' stance that the delay should continue until DOJ decided the petition for review. The jurisprudence in *Samson v. Daway* and *Diño v. Olivarez* highlighted the mandate of a strict 60-day limit for arraignment suspension, which had already been generously exceeded in this case without proper resolution from the DOJ.

3. Completeness of Preliminary Investigation:

The Court refuted petitioner's assertion of an incomplete preliminary investigation. The petitioners were allowed to file relevant counter-affidavits and rejoinders. Hence, any further claims on premature Information filing were unfounded since filing motions for reconsideration at the preliminary investigation stage was part of due process and provided by Section 56 of the Manual for Prosecutors and the pertinent rule (2000 NPS Rule on Appeal).

Doctrine:

The case underscored the strict adherence to procedural rules concerning the allowable suspension of arraignment, emphasized in *Samson v. Daway*, and reaffirmed the substantive right to a complete preliminary investigation, as long as due processes are observed.

Class Notes:

- **Estafa (Article 315, RPC)**: Involves deceit and fraudulent acts that lead to loss or damage to another party.

- **Preliminary Investigation**: A substantive right ensuring the accused face trial only after a thorough assessment of evidence.
- **Procedural Rule**: A 60-day limit for suspension of arraignment under Rule 116, Section 11(c) of the Rules of Court.
- **Circular No. 38-98**: For ensuring speedy trial compliance.
- **Case Citation**: 755 PHIL. 536 (2015).

Historical Background:

Understanding the cyclical delays in the Philippine judicial system contextualizes the focus on the timely administration of justice. This decision highlights systemic improvements and judicial efficiency, reflecting reforms through strict adherence to procedural timelines and merits-based resolutions.

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This explanation serves as an accessible comprehension aid for students, integrating precise doctrine application and procedural recall critical for legal practice and examination preparedness.