

Title:

Reodica vs. Court of Appeals and People of the Philippines, G.R. No. 128064, January 19, 2000.

Facts:

On the evening of October 17, 1987, Isabelita Reodica was driving a van along Doña Soledad Avenue in Parañaque, Metro Manila. Due to alleged reckless driving, her van collided with the car of Norberto Bonsol. As a result, Bonsol sustained physical injuries, and his car incurred damage costing P8,542.00. On October 20, 1987, Bonsol filed a complaint against Reodica with the Fiscal's Office. Subsequently, an information was filed before the Regional Trial Court (RTC) of Makati on January 13, 1988, charging Reodica with "Reckless Imprudence Resulting in Damage to Property with Slight Physical Injury".

Reodica was arraigned and pled not guilty. The trial ensued, and on January 31, 1991, the RTC found her guilty and sentenced her to six months of arresto mayor and ordered her to pay damages amounting to P13,542.00 (covering car repairs and medical expenses).

Reodica appealed the conviction to the Court of Appeals (CA), which affirmed the RTC's decision on January 31, 1996. Following a denied motion for reconsideration, she filed a petition for review on certiorari with the Supreme Court, arguing that the penalty imposed was incorrect and that the offenses had prescribed and should not have been complexed.

Issues:

1. Whether the penalty imposed on Reodica was correct.
2. Whether the quasi offenses of reckless imprudence resulting in damage to property and slight physical injuries were light felonies.
3. Whether the rule on complex crimes under Article 48 of the Revised Penal Code applies to the quasi offenses in question.
4. Whether the duplicity of the information may be questioned on appeal.
5. Whether the RTC had jurisdiction over the offenses.
6. Whether the offenses had prescribed.

Court's Decision:

****1. Proper Penalty:****

The Supreme Court held that the penalty imposed by the lower courts was incorrect. The penalty for reckless imprudence resulting in slight physical injuries should be public censure, not arresto mayor, because the imposition of arresto mayor was based on an

erroneous application of a clerical error from secondary sources. The penalty for reckless imprudence resulting in damage to property amounted to *arresto mayor* in its minimum and medium periods due to the amount of damage.

****2. Classification of Offenses:****

The Court classified reckless imprudence resulting in slight physical injuries as a light felony, punishable by public censure. Meanwhile, reckless imprudence resulting in damage to property was classified as a less grave felony.

****3. Applicability of the Rule on Complex Crimes:****

The Court ruled that Article 48 does not apply when one of the resulting felonies is light. Thus, the offenses should not be considered a complex crime, following the *Lontok v. Gorgonio* precedent. Each offense should be subject to separate penalties.

****4. Challenge to Duplicity:****

Reodica waived her right to challenge the duplicitous information by failing to raise this objection before pleading to the charge. Therefore, despite the misjoinder of charges, the court could proceed to render a judgment on both offenses.

****5. Jurisdiction:****

The RTC lacked jurisdiction over the offenses. The jurisdiction for offenses punishable by censure (reckless imprudence causing slight physical injuries) and by *arresto mayor* (reckless imprudence resulting in property damage) lies with the Metropolitan Trial Courts, Municipal Trial Courts, or Municipal Circuit Trial Courts under *Batas Pambansa Blg. 129*.

****6. Prescription:****

The offenses had not prescribed. The filing of the complaint with the Fiscal's Office three days after the incident tolled the prescriptive period, which remained interrupted until the case's termination. Therefore, the offenses had not reached the two-month prescriptive period for light felonies or the five-year period applicable to less grave felonies.

Doctrine:

****1. Proper Penalty Doctrine:**** The penalty for quasi offenses (reckless imprudence) must closely follow the revised penalties outlined by law, and public censure applies for light felonies like slight physical injuries.

****2. Complex Crime Exception Doctrine:**** Criminal negligence resulting in one light felony and one less grave felony does not create a complex crime under Article 48 of the Revised Penal Code.

****3. Jurisdiction and Prescription Doctrine:**** Jurisdiction resides in lower courts for penalties lower than prision correccional, and prescription rules for quasi offenses involve the interruption of the prescriptive period upon the filing of a complaint with the fiscal.

Class Notes:

- Reckless imprudence with slight physical injury: Penalty reduced to public censure.
- Reckless imprudence with property damage: Under arresto mayor in its minimum and medium periods.
- Complex crimes do not apply to cases where resulting offenses include light felonies.
- Jurisdiction for light and less grave felonies: MeTC, MTC, MCTC.
- Prescription of offenses starts from when the crime is discovered and is halted by filing a complaint with the fiscal's office.

Historical Background:

In this 1987 vehicular collision case, the primary historical context involves the judicial restructuring under Batas Pambansa Blg. 129 and amendments reshaping penalties and court jurisdictions. The period also reflected earnest legal attempts to streamline procedural and substantive criminal law which were pivotal in modern Philippines' criminal justice reforms.