

People of the Philippines vs. Martin Alagao, et al.

Facts

****October 20, 1962**** - The City Fiscal of Manila filed an information charging the defendants (members of the Manila Police Department) with the complex crime of incriminatory machinations through unlawful arrest. The case stems from events on ****February 28, 1961,**** where the defendants allegedly arrested Marcial Apolonio y Santos without reasonable grounds, and subsequently commingled a marked P1.00 bill with money taken from Apolonio during his investigation, to frame him for bribery.

****October 25, 1962**** - The defendants moved to quash the information on two grounds: (1) that the facts alleged do not constitute an offense, and (2) the court lacked jurisdiction. A supplemental motion was later filed claiming that the information charges more than one offense.

****November 9, 1962**** - The Court of First Instance of Manila sustained the motion to quash, reasoning that the alleged acts constituted two distinct offenses (unlawful arrest and incriminatory machinations) and not a complex crime. The court concluded that either offense, individually, falls under the jurisdiction of an inferior court.

****November 28, 1962**** - The City Fiscal of Manila filed a motion for reconsideration, which was denied on ****December 19, 1962****.

Appeal was made to the Supreme Court by the City Fiscal of Manila.

Issues

1. Whether the information filed in the lower court alleges the complex crime of incriminatory machinations through unlawful arrest.
2. Whether the Court of First Instance of Manila has jurisdiction over the offense charged.

Court's Decision

****Issue 1: **Complex Crime Allegation****

The Supreme Court held that the information did indeed sufficiently charge the commission of a complex crime. The phrase "through unlawful arrest" implies that unlawful arrest was a necessary means to plant incriminating evidence, thereby framing Apolonio for bribery. The Supreme Court found merit in the argument that the unlawful arrest and planting of evidence were closely connected actions, where the former facilitated the commission of the latter. The Court distinguished that the determination should be based on the facts alleged

rather than evidence, reversing the lower court's dismissal of the information.

****Issue 2:**** ****Jurisdiction****

The Supreme Court ruled that under Article 48 of the Revised Penal Code, in cases of complex crimes, the graver penalty was to be applied. Since the penalty for unlawful arrest (up to six months imprisonment or a fine) falls within its jurisdiction when considered as part of a complex crime, the Court of First Instance of Manila was competent to try the case.

Doctrine

1. ****Complex Crime Principle****: For the commission of a complex crime to be charged, it is enough that the factual allegations suggest that one offense was a necessary means to commit the other, even if they are distinct and labeled separately by law.
2. ****Jurisdiction Over Complex Crimes****: The Court of First Instance has jurisdiction over complex crimes where the graver of the penalties determined belongs under its jurisdiction.

Class Notes

- ****Complex Crimes under Article 48, Revised Penal Code****: Crimes should have proceeded from a single criminal intent where one offense was a necessary means to commit the other for them to be considered a complex crime.
- ****Article 269 (Unlawful Arrest)****: Arrest without lawful cause by a public officer is punished by arresto mayor and a fine.
- ****Article 363 (Incrimatory Machinations)****: Planting evidence with the intent to frame someone for a crime is also punished by arresto mayor.
- Rule 117, Sec. 2, provides grounds for a motion to quash, including facts not constituting an offense and lack of jurisdiction.

Historical Background

This case occurred during a period when the Philippine legal system was refining its interpretations of complex crimes and their procedural applications. The issue revolved around ensuring that acts of public officials, particularly law enforcement, were closely regulated to prevent abuses of power, such as unlawful arrests and planting evidence. This case reinforces the judiciary's vigilance in preventing misuse of authority.