

Title:

Rosa Uy vs. Court of Appeals and People of the Philippines, G.R. No. 97719 (1991)

Facts:

1. Rosa Uy, an accountant at Don Tim Shipping Company, resigns on 15 March 1982 to manage a lumber business with her husband.
2. Rosa maintains a good relationship with Consolacion Leong, the owner's wife.
3. Rosa and Consolacion agree to form a partnership to expand the lumber business with Consolacion contributing additional capital amounting to P500,000.
4. Receipts and other transactions were done without formal documentation, reflecting their trust.
5. Their relationship deteriorates when Rosa fails to process partnership documents.
6. Consolacion demands the return of her investment. Rosa issues checks to Consolacion, which are dishonored due to insufficient funds.
7. Consolacion files complaints for estafa and violations of the Bouncing Checks Law (B.P. Blg. 22) at the Regional Trial Court (RTC) of Manila.
8. On 10 December 1984, informations for estafa and violations of B.P. Blg. 22 (Crim. Cases Nos. 84-32335 to 84-32340) are filed against Rosa.
9. The RTC tries the cases jointly and acquits Rosa of estafa but convicts her of the B.P. Blg. 22 charges.
10. Rosa appeals to the Court of Appeals, which affirms the RTC's decision in toto.
11. Rosa files a petition for review on certiorari to the Supreme Court.

Issues:

1. Did the RTC of Manila have jurisdiction over the B.P. Blg. 22 cases?
2. Were the questioned checks issued on account or for value?

Court's Decision:

****Jurisdiction:****

- The Supreme Court discusses the basic principle that jurisdiction in criminal cases is based on the territoriality where the offense or its essential ingredients were committed.
- The complaint and information should have clearly alleged that the offense took place in Manila for the RTC to have jurisdiction.
- The records show:
 - Complainant was from Makati.
 - Petitioner was from Caloocan City.
 - Business transactions primarily took place in Malabon, and checks were deposited in

Makati.

- The prosecution's argument that jurisdiction over the estafa case confers jurisdiction over the B.P. Blg. 22 cases is incorrect. Estafa and B.P. Blg. 22 are distinct crimes with separate elements.
- The Supreme Court finds no evidence any part of the B.P. Blg. 22 offense took place in Manila. The essential elements: issuance, making, drawing, dishonor of checks, or knowledge of insufficient funds occurring in Manila, were not proven.
- Jurisdiction is not subject to estoppel, meaning even if Rosa did not initially challenge jurisdiction, she was entitled to do so later.
- **Held:** The RTC of Manila did not have jurisdiction over Crim. Cases Nos. 84-32335 to 84-32340.

On the Checks:

- Since jurisdiction over these cases was not proven, the Supreme Court did not need to discuss extensively whether the checks were issued on account or for value but would presumably hinge on establishing essential elements required by B.P. Blg. 22 within the correct jurisdiction.

Doctrine:

- **Territorial Jurisdiction in Criminal Law:** For a court to acquire jurisdiction in criminal cases, the crime or its essential elements must occur within its territorial jurisdiction.
- **Separate and Distinct Crimes:** Jurisdictions for multiple crimes, even if related, must be independently established.
- **Non-Waivability of Jurisdiction:** Lack of jurisdiction can be raised at any stage of the proceedings; a party is not estopped by delayed objection unless clear and unjustifiable laches are established.

Class Notes:

- **Territorial Jurisdiction:** Courts must prove that the crime or its essential ingredients occurred within their jurisdiction (Us vs. Cunanan, 26 Phil. 376-378).
- **Separate Offenses:** Estafa and B.P. Blg. 22 are distinct crimes; each must independently meet jurisdictional requirements (People vs. Galano, 75 SCRA 193).
- **Non-Waivability:** Jurisdictional objections can be raised at any time (Rule 117, Sec. 3, Revised Rules on Criminal Procedure).

Historical Background:

This case reflects the procedural rigors within the Philippine judicial system in securing

convictions based on detailed adherence to jurisdiction. It underscores accountability in criminal adherence to statutory venue requirements and the enduring principle that jurisdiction, especially in criminal matters, is foundational and unbending.