

THE PEOPLE OF THE PHILIPPINES, PETITIONER AND APPELLANT, VS. HON. DIONISIO VENDIOLA, RESPONDENT AND APPELLEE.

G. R. No. L-14207. May 30, 1962

Ponente: BAUTISTA ANGELO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/2c4a28e09a02/>

BAUTISTA ANGELO, J.:

On February 3, 1958, a complaint for the complex crime of serious physical injuries and damage to property thru reckless imprudence was filed against Pedro Capuno before the Justice of the Peace Court of Sariaya Quezon.

The justice of the peace court, after conducting the first stage of the preliminary investigation, issued a warrant of arrest and thereafter set the case for trial on the merits. The provincial fiscal refused to enter trial alleging that the case does not come within the jurisdiction of said court but is triable before the court of first instance in accordance with the provisions of the Judiciary Act of 1948, as amended, so that the only function of said justice of the peace court was to conduct the requisite preliminary investigation.

The objection of the fiscal having been overruled, he filed with the Court of First Instance of Quezon a petition for prohibition with preliminary injunction wherein he contended that the case did not fall within the jurisdiction of the Justice of the Peace Court of Sariaya. He submitted a memorandum in support of his petition, which was replied by respondent justice of the peace.

After hearing, the court a quo issued an order denying the petition on the ground that "the amended complaint is wanting in an allegation of specific amount of the damage caused to the property (horse) of Crisanto Alcala which is a determining factor on the question of jurisdiction raised." The fiscal has appealed.

The court a quo came to the conclusion that the offense charged comes within the original jurisdiction of the Justice of the Peace Court of Sariaya because the only damage alleged in the complaint which was caused to the property is a fracture in one of the legs of a horse whose value is P320.00, and evaluating the value of one of the legs as only 1/4 the corresponding damage would be small and would come within the jurisdiction of said justice of the peace court.

We disagree with this view, for experience has shown that a horse who has a broken leg is useless for practical purposes as it can no longer be used in connection with its ordinary occupation. For this reason, the value of the injury cannot be limited to the fractured leg but to the animal as a whole. It may, therefore, be said that the value of the property damaged as alleged in the complaint is the sum of P320.00. The horse has ceased to be an asset to become a liability to its owner.

Considering that the damage to the horse amounts to P320.00, the question that arises is: Is the offense charged within the jurisdiction of the Justice of the Peace Court of Sariaya, as found by the court a quo?

According to Article 365, paragraph 3, of the Revised Penal Code, damage to property thru reckless imprudence shall be penalized by a fine ranging from an amount equal to the value of the damage to three times such value. And Section 87, paragraph b, of the Judiciary Act of 1948, as amended, provides that the justice of the peace court

has original jurisdiction over all offenses in which the penalty provided by law is not more than 6 months imprisonment or a fine of not more than P200.00, or both such fine and imprisonment. Hence, if the accused were found guilty and a fine is to be imposed upon him, considering the value of the property damaged, it is clear that the offense does not come within the jurisdiction of the justice of the peace court.

It is, however, contended that since the offense charged is the complex crime of serious physical injuries and damage to property thru reckless imprudence, and under Article 48 of the Revised Penal Code, the penalty for the most serious crime shall be imposed, it follows that the offense comes within its jurisdiction because the most serious offense charged is serious physical injuries committed thru reckless imprudence which, under Article 363, paragraph 4, of the Revised Penal Code, carries the penalty of "arresto mayor in its maximum period to prision correccional in its minimum period." This contention is untenable, for even if the most serious offense charged be within the jurisdiction of respondent court, since the same is complexed with damage to property, wherein the fine to be imposed does not come within its jurisdiction, the charge comes within the jurisdiction of the court of first instance.

This is what we held in a case we have recently decided.[1] In that case, one Villanueva was accused of the crime of serious and less serious physical injuries with damage to property in the amount of P2,636.00 thru reckless imprudence. After the accused had pleaded not guilty the private prosecutor raised the question of jurisdiction alleging that the justice of the peace court could not try the case because the amount of fine imposable, aside from the penalty for the physical injuries committed, was beyond its jurisdiction. The justice of the peace court declared itself without jurisdiction, but on appeal the court of first instance ruled otherwise. And when the case was appealed to this Court, we held that the lower court was in error in holding that the case comes within the jurisdiction of the justice of the peace court. The following is our comment on the matter:

"We find the appeal well-taken, for this case comes squarely under the rule laid down by us in *Angeles, et al. v. Jose*, 96 WL, 151; 50 Off. Gaz. No. 12, 5764, wherein we held that:

"The above-quoted provision (Art. 365, par. 3, Revised Penal Code) simply means that if there is only damage to property the amount fixed therein shall be imposed, but if there are also physical injuries there should be an additional penalty for the latter. The information cannot be split into two; one for the physical injuries and another for the damage to property, for both the injuries and the damage committed were caused by one single act of the defendant and constitute what may be called a complex crime of physical injuries and damage to property. It is clear that the fine fixed by law in this case is beyond the jurisdiction of the municipal court and within that of the court of first instance." "

"Considering that it is the court of first instance that would undoubtedly have jurisdiction if the only offense that resulted from appellant's imprudence were the damage to property in the amount of P2,636.00, it would be absurd to hold that for the graver offense of serious and less serious physical injuries combined with damage to property through reckless imprudence, jurisdiction would lie in the justice of the peace court. The presumption is against absurdity, and it is the duty of the courts to interpret the law in such a way as to avoid absurd results. Our system of apportionment of criminal jurisdictions among the various trial courts proceeds on the basic theory that crimes cognizable by the Courts of First Instance are more serious than those triable in justice of the peace or municipal courts.

"Moreover, we cannot discard the possibility that the prosecution may not be able to prove all the supposed offenses constituting the complex crime charged. Were we to hold that it is the justice of the peace court that has jurisdiction in this case, if later the prosecution should fail to prove the physical injuries aspect of the case and establish only the damage to property in the amount of P2,636.00, the inferior court would find itself without jurisdiction to impose the fine for the damage to property committed, since such fine can not be less than the amount of the damage. Again, it is to avoid this further absurdity that we must hold that the

jurisdiction lies in the court of first instance in this case."

Wherefore, the order appealed from is set aside. The case is remanded to the court a quo for further proceedings. No costs.

Padilla, Labrador, Concepcion, Reyes, J. B. L., Barrera, Paredes, and Dizon, JJ., concur.

[1] People vs. Villanueva, 111 Phil., 869.

ABOUT BATAS.ORG

Study smarter at BATAS.org

The Philippine bar review and law-school companion built around how your brain actually remembers.

The complete Philippine law library - free for everyone.

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

Audio case-brief lectures.

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

Bar review built on the science of memory.

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

The full law-school curriculum.

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

Mock exams that tell you where you stand.

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

A study planner that keeps you on pace.

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

Start free at <https://batas.org>

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.