

****Case Title:****

Marissa Ceniza-Manantan v. People of the Philippines

****Facts:****

1. ****Background****: Alberto Carilla, a jeweler in Quezon City, entered into an agreement with sisters-in-law, Regina Manantan-Vizconde and Marissa Ceniza-Manantan, to sell jewelry worth P1,079,000.00. They were supposed to either remit proceeds within two weeks or return unsold jewelry.
2. ****Breach of Agreement****: After the agreed period, neither the proceeds of the sale were remitted nor the jewelry returned. Carilla made demands which were met with issuance of postdated checks from both Regina and Marissa, which were later dishonored due to “account closed” accounts.
3. ****Legal Action****: Carilla filed a complaint for estafa after his demands remained unmet. Vizconde became at large while Manantan was arrested on December 2, 1998, and pleaded “Not Guilty” during arraignment on March 5, 1999.
4. ****Trial Court Proceedings****: The trial progressed with Carilla testifying about the agreement and Manantan’s default. Manantan presented a defense of denial and claimed harassment. She also alleged a misunderstanding involving the checks with her sister-in-law.
5. ****Judgment by RTC****: The Regional Trial Court found Ceniza-Manantan guilty of estafa under Article 315, paragraph 1(b) of the Revised Penal Code and sentenced her to 12 years and 1 day to 14 years and 8 months of imprisonment, plus restitution of the jewelry value.
6. ****Appeal to Court of Appeals****: Manantan appealed, but the Court of Appeals upheld the RTC’s decision, modifying her sentence to an indeterminate term of 4 years and 2 months to 20 years.
7. ****Petition for Certiorari****: Manantan filed a petition to the Supreme Court after her motion for reconsideration was denied, citing insufficiency of evidence and ineffective counsel as grounds.

****Issues:****

1. **Sufficiency of Evidence**: Whether the evidence presented by the prosecution was insufficient to prove petitioner's guilt beyond reasonable doubt due to a lack of required elements of the crime, particularly alleging conspiracy and trust receipt.
2. **Ineffective Legal Representation**: Whether Manantan was denied effective legal counsel resulting in a miscarriage of justice, calling for a retrial to enable substantial defense.

Court's Decision:

1. **Evidence Evaluation**: The Supreme Court affirmed lower court findings that Carilla's testimony was credible, substantiated by dishonored checks and demand letters. Manantan's contention about legal representation was dismissed since her lawyer's effort did not equate to gross negligence.
2. **Conviction of Estafa**: The elements for estafa were deemed satisfied, showing that Manantan received the jewelry on trust, misappropriated or converted it for personal use, causing prejudice to Carilla. Her bare denials were deemed insufficient to rebut evidence.
3. **Legal Representation**: The Court asserted that inadequate representation does not automatically command retrial unless it amounts to gross negligence depriving the client of basic rights, which was not the case here.
4. **Sentence and Damages**: The imposition of 20 years maximum penalty was deemed correct per the combination of the Revised Penal Code and the Indeterminate Sentence Law. Furthermore, the restitution to Carilla of P1,079,000.00 was upheld.

Doctrine:

- The essential doctrine reiterated is that conviction can be based on the testimony of a single credible witness and the presence of tangible evidence such as dishonored checks can substantiate intent and action in crimes requiring specific obligations, such as in estafa.

Class Notes:

- **Elements of Estafa under Article 315(1)(b)**:
1. Money, goods, or property received in trust.
 2. Misappropriation or conversion, or denial of receipt.
 3. Prejudice to the owner.

- **Legal Representation**: A client is bound by counsel's acts unless recklessness results in a denial of due process.
- **Prison Sentence Application**: Sentence capped by the Indeterminate Sentence Law and relevant penal code articles.

Historical Background:

This case highlights fraud issues emerging from breaches of trust typical in agency transactions within the Philippine legal context, emphasizing the judiciary's commitment to uphold convictions based on solid testimonial and documentary evidence. It underscores the 20-year cap on penalties in fraud cases with significantly large monetary damages, reflecting on legal reforms in the procedures for criminal culpability assessments based on existing statutory mandates.