

****Title:**** People of the Philippines v. Jose Y. Sison, G.R. No. L-11669

****Facts:****

1. Jose Y. Sison was charged in the Municipal Court of Manila with violating Ordinance No. 2646, the Traffic Rules and Regulations of Manila.
2. Sison moved to dismiss the case on the grounds that his alleged actions did not constitute an offense. The Municipal Court Judge dismissed the case.
3. Sison filed an administrative complaint against the police officer who issued the Traffic Violation Report. Upon being informed of this complaint, the Judge ordered the case to be set for trial.
4. Post-trial, Sison was found guilty and sentenced to pay a fine of PHP 50, with subsidiary imprisonment upon insolvency, and was ordered to pay the costs.
5. Sison appealed to the Court of First Instance, arguing for dismissal based on the invalidity of the subordinate court's jurisdiction and the information itself.
6. The Court of First Instance denied the motion, took the trial on merits, and affirmed the conviction, but reduced the fine to PHP 25.
7. Sison further appealed, contending that the municipal judge acted improperly by reinstating the case by merely cancelling his signature from the dismissal order.

****Issues:****

1. Whether the municipal judge's action of reinstating the case by altering the dismissal was valid.
2. Whether a reinstatement after a judgment of acquittal is permissible.
3. Whether the information upon which Sison was tried was valid after the initial dismissal.

****Court's Decision:****

- ****Issue 1:**** The Supreme Court held that the judge's action of reinstating the case without authority renders the continuation of the proceedings invalid. The mere obliteration of a dismissal signature is inadequate to revive a case.
- ****Issue 2:**** The Court reiterated the principle that a judgment of acquittal becomes final immediately upon promulgation and cannot be recalled for correction or amendment. Any action contrary to this established principle is without merit.
- ****Issue 3:**** Without a valid new information, Sison's conviction was held to be invalid. The prior dismissal of the information precluded subsequent conviction on it.

The Supreme Court reversed the lower court's decision and dismissed the case with costs

de officio.

****Doctrine:****

- **Doctrine of Finality of Acquittal:** Once a judgment of acquittal is promulgated, it immediately becomes final and cannot be altered, revised, or reinstated.
- **Revocation of Dismissals:** A case once dismissed, especially if the ruling includes exoneration, requires a new valid information for proceedings to occur lawfully.

****Class Notes:****

- **_Elements of Finality of Judgment_:** An acquittal is final upon promulgation and res judicata, barring any future litigation on the same facts.
- **_Procedural Regularity_:** Cut through procedural obscurantism; dismissals and acquittals can't be casually reconsidered.

****Historical Background:****

This case showcases an era in Philippine jurisprudence characterized by stringent adherence to procedural niceties involving criminal procedure and the finality of acquittals. It reflects judicial caution against prosecutorial overreach and underscores procedural safeguards integral to the accused's rights within the Philippine legal system.