

Title: United States vs. Go Chico

Facts:

Go Chico displayed medallions in his store window featuring Emilio Aguinaldo and symbols used during the Philippine insurrection against the United States. He had acquired these medallions from a sheriff's sale and claimed ignorance of Act No. 1696, which prohibits the display of such revolutionary symbols. Upon trial, he was found guilty, fined, and sentenced to subsidiary imprisonment until payment of the fine. He appealed, raising the issues of necessary criminal intent for conviction and what constituted as the illegal items under the Act.

Issues:

The Supreme Court tackled two main issues:

1. Whether a conviction under Act No. 1696 requires proof of criminal intent.
2. Whether the prohibition only applies to the actual emblems used during the insurrection or includes duplicates thereof.

Court's Decision:

The Court held that criminal intent is not necessary for a conviction under Act No. 1696, as the act alone, irrespective of motive, constitutes the crime due to the pernicious effect it has on public order. The Court also decided that the law applies not only to the actual emblems used but to any representations of the type used in the insurrection, therefore including duplicates.

Doctrine:

The doctrine established is that for certain statutory offenses, intent to commit the crime is not a requisite element; rather, the intentional commission of the prohibited act alone suffices to establish criminal liability.

Historical Background:

The case originated in the early American colonial period in the Philippines, where displaying symbols of past insurrection was criminalized to prevent the incitement of resistance or rebellion against U.S. authority.

Class Notes:

Under Act No. 1696, "Any person who shall expose... any flag, banner, emblem, or device used during the late insurrection in the Philippine Islands to designate or identify those in armed rebellion against the United States..." is punishable by fine or imprisonment. The

Court relied upon principles that certain statutes seek to prevent harm solely by deterring specific actions without regard to the actor's intent. This aligns with public policy considerations that desire a deterrent that does not allow for defenses predicated on the purity of the doer's intent. The Court's application of statutory interpretation emphasizes looking beyond a literal reading to discern legislative intent and effectuate the purpose of the law, thus barring displays of both the actual emblems and their representations.

In sum, the legal provisions directly related to the specifics of the case come from statutory interpretation, understanding legislative intent, and distinguishing between mala in se and mala prohibita offenses. The Court viewed the act of displaying insurrectionary symbols as inherently dangerous to public order, thus deeming the actor's intent irrelevant to the establishment of criminal liability.