

Title: Arsenia B. Garcia vs. Court of Appeals and the People of the Philippines

Facts:

Arsenia B. Garcia, an election officer, was charged along with other individuals for decreasing the votes received by senatorial candidate Aquilino Q. Pimentel, Jr. during the May 8, 1995 elections in Alaminos, Pangasinan. The accusation was premised on the alleged alteration of votes from 6,998 to 1,921 in the Statement of Votes (SOV) and Certificate of Canvass (COC). Based on a complaint-affidavit by Pimentel, an information dated March 30, 1998, was filed in the Regional Trial Court (RTC) of Alaminos.

Throughout the trial, the RTC found the evidence against all accused except Garcia to be insufficient, leading to their acquittal. Garcia was convicted, sentenced to six years imprisonment, with no possibility of probation, disqualified from holding public office, and deprived of the right to vote.

Garcia appealed to the Court of Appeals, which affirmed the RTC's decision but modified the sentence by increasing the minimum penalty from six months to one year. Garcia then appealed to the Supreme Court on grounds that supposedly implicated errors in the Court of Appeals' judgment.

Issues:

The Supreme Court addressed the following issues:

1. Whether a violation of Section 27(b) of Republic Act No. 6646 is classified under mala in se or mala prohibita.
2. Whether good faith and lack of criminal intent can be valid defenses in the case of decreasing votes as specified under Section 27(b) of Republic Act No. 6646.

Court's Decision:

The Supreme Court upheld the decision of the Court of Appeals, denying Garcia's appeal. The Court clarified that the acts prohibited in Section 27(b) are mala in se, as intentionally decreasing votes is inherently immoral and carried out with malice to injure a candidate. The Court ruled that Garcia, as the chairman of the Municipal Board of Canvassers, failed to assure accurate entry of votes and her actions manifested an intention to perpetuate the erroneous entry. The Supreme Court emphasized that public policy demands extraordinary diligence from members of the board of canvassers, and any mistakes can lead to disenfranchisement of voters. Based on the evidence, the Court found no indication of good faith or that the decrease in votes was due to error or mistake.

Doctrine:

Crimes that involve inherently immoral acts, such as tampering with election results, are deemed mala in se and require proof of criminal intent for conviction. Good faith is not a defense in election offenses classified as mala in se under special laws like election laws.

Class Notes:

Key elements in this case:

- A violation of Section 27(b) of Republic Act No. 6646 is considered an offense of mala in se and requires criminal intent.
- In election offenses, good faith or lack of criminal intent is not a valid defense when the act itself is inherently immoral and done with malice.

Historical Background:

This case took place in the context of the 1995 Philippine general elections, a period when electoral fraud and manipulation were significant concerns in the country's democratic processes. Republic Act No. 6646, known as the "Electoral Reforms Law of 1987," aims to ensure the integrity of elections by imposing penalties on unlawful election practices. The case underscores the judiciary's role in upholding electoral laws and penalizing violations to preserve the credibility of election results.