

Title: “The People of the Philippines vs. Hon. Vicente B. Echaves, Jr., et al.”

Facts:

On October 25, 1977, Fiscal Abundio R. Ello filed separate informations against sixteen individuals, including Ano Dacullo, Geronimo Oroyan, Mario Aparici, Ruperto Cajes, and Modesto Suello, for squatting on grazing land in Talibon, Bohol, as penalized by Presidential Decree (PD) No. 772. The accused were charged with unlawfully entering and cultivating parts of a grazing land against the will of Atty. Vicente de la Serna, Jr., the successor to the pasture applicant Celestina de la Serna.

The cases were assigned to Judge Vicente B. Echaves, Jr., who issued an omnibus order on December 9, 1977, dismissing the five informations on two grounds: one, the accused allegedly used “stealth and strategy” instead of the force, intimidation, or threat specified by the decree; and two, the decree, under the rule of *ejusdem generis*, does not cover the cultivation of grazing lands.

Following the dismissal, the fiscal amended the informations to align more closely with the decree’s language and requested reconsideration, which was denied by Judge Echaves. The fiscal appealed to the Supreme Court under Republic Act No. 5440, arguing that PD No. 772 should also apply to agricultural lands, particularly grazing lands.

Issues:

1. Whether Presidential Decree No. 772, which penalizes squatting and similar acts, applies to agricultural lands, including grazing lands.
2. Application of the rule of *ejusdem generis* in interpreting the scope of PD No. 772 concerning the phrase “and for other purposes.”

Court’s Decision:

The Supreme Court affirmed the trial court’s order of dismissal, holding that PD No. 772 is intended to apply only to squatting in urban communities, particularly to illegal constructions in such areas, and not to agricultural lands, including grazing lands. The Court reasoned that the preamble of PD No. 772 suggests it was aimed at addressing the problem of squatting in urban areas by affluent individuals and not at agricultural trespassers in rural areas. The Court further noted that squatting in public agricultural lands, such as the grazing lands involved in this case, is already penalized under Republic Act No. 947.

The Court rejected the fiscal’s call for a broad application of PD No. 772 to include

agricultural lands, emphasizing the legislative intent discernible from the decree's preamble and supported by existing legislation specifically addressing squatting on public agricultural lands.

Doctrine:

- **Presidential Decree No. 772 does not apply to agricultural lands**: PD No. 772, aimed at penalizing squatting and similar acts, is specifically intended for urban communities and does not extend to agricultural lands, including grazing lands.
- **Rule of Ejusdem Generis**: This rule, which suggests that general terms following specific ones should be interpreted as including objects akin to those specified, does not apply when the legislative intent is clear and unambiguous.

Class Notes:

- **Presidential Decree No. 772**: Specifies the criminal act of squatting and similar offenses in urban areas, not extending to agricultural lands. For urban squatting: involves force, intimidation, threat, or taking advantage of a landowner's absence or tolerance.
- **Republic Act No. 947**: Addresses squatting on public agricultural lands, stressing that legal frameworks specific to contexts (urban vs. agricultural lands) should guide legal analysis and application.
- **Legislative Intent and Preamble Interpretation**: The importance of considering the preamble of a law or decree to understand its scope and intended application, as demonstrated in the interpretation of PD No. 772.
- **Rule of Ejusdem Generis**: A statutory construction tool, not applicable when legislative intent is clear, emphasizing the necessity to assess each case's legislative intent before applying general rules of interpretation.

Historical Background:

The issue emerged within the broader context of addressing squatting in the Philippines, a substantial problem both in urban and rural areas. While urban squatting often involved illegal constructions and habitation by people from various socioeconomic backgrounds, squatting on agricultural lands primarily concerned illegal occupation and cultivation. PD No. 772 was part of an array of decrees and laws aimed at curbing these phenomena, each tailored to specific contexts highlighted by this case's distinction between urban constructions and rural agricultural land occupation.