

****Title:**** Salud P. Beradio vs. The Court of Appeals and People of the Philippines

****Facts:****

Salud P. Beradio, a lawyer and Election Registrar for the Commission on Elections in Rosales, Pangasinan, was convicted on four counts of falsification of public or official documents out of seven charges for making false entries in her daily time records. The procedural journey began with Beradio's conviction by the Circuit Criminal Court in Dagupan City on specific dates, which was later affirmed by the Court of Appeals (CA-G.R. No. 20319 to 20322). Beradio then filed a petition for review on certiorari with the Supreme Court, raising several legal issues chiefly concerning the application of Article 171, paragraph 4, of the Revised Penal Code on falsification of public documents and questioning the legality of her conviction both as a former public official and under the obligation to fill up and submit time records.

****Issues:****

1. Whether the conviction under Article 171, paragraph 4, of the Revised Penal Code is legal and proper.
2. Whether Beradio could be prosecuted for an offense where she was no longer a public official.
3. Whether Beradio was under legal obligation to fill up and submit time records.
4. Assuming such obligation, whether the statements in her time record reflected any "color of truth."
5. Whether damage to the government in falsification of public or official document cases is of no moment.
6. Whether Beradio is entitled to acquittal on the ground of reasonable doubt.

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

The Supreme Court acquitted Beradio, reversing the decisions of the lower courts. It emphasized the lack of criminal intent (*dolo*) in Beradio's actions. The Court clarified that for a conviction of falsification of public documents, the action must be with wrongful intent, which was absent in Beradio's case. It recognized her absences from the office were brief, authorized by the COMELEC for appearances in court, and did not result in failure to fulfill her duties as an Election Registrar. Additionally, the Court recognized Beradio's belief in being entitled to full pay for those days as a color of truth, not a deliberate falsification.

****Doctrine:****

This case reiterates that for a conviction of falsification of public or official documents, the

action must be with wrongful intent (dolo), and mere inaccuracies do not constitute the crime. It also highlights the significance of the actual damage or impact of the falsification on the public trust and document integrity.

****Class Notes:****

1. ****Key Elements for Falsification of Public Documents:****
 - False statements in a document's narration of facts.
 - Legal obligation to disclose the truth of the narrated facts.
 - The facts narrated are absolutely false.
 - Perversion of truth made with the intent of injuring a third person.
2. ****Intent (Dolo) vs. Negligence (Culpa):**** In most crimes, wrongful intent is necessary for conviction, except where negligence is the element required.
3. ****Public Document Falsification:**** Unlike in private documents, the intent to gain or injure a third person is not necessary; undermining public faith and violating sworn truth are the concerns.
4. ****Legal Obligation on Time Records:**** Not all public officers are strictly required to keep and submit daily time records, depending on their roles and duties within the government.

****Historical Context:****

This case provides insight into the complexities of legal obligations of public officials, the nuances in the applicability of legal statutes like Article 171 of the Revised Penal Code, and the balance between administrative duties and broader public service. It underscores the evolving nature of legal interpretations and the Supreme Court's authority in guiding those interpretations for justice.