

****Title**:** *The People of the Philippines vs. Jose Luis Godinez*

****Facts**:**

Jose Luis Godinez, a shipmaster in the Philippine coastwise trade before the Pacific War, was prosecuted and tried for treason by the Fifth Division of the People's Court, with Judge F. V. Borromeo dissenting. Following the Japanese invasion of the Philippines, from May 1942 to June 1943 and then from May 1943 to October 1944, Godinez served the Japanese Navy and Army as a pilot in the Port of Cebu, earning a monthly salary for his services. His involvement with the Japanese occupiers led to his arrest and trial on charges of treason. Throughout the trial, Godinez claimed he complied with the Japanese demands due to a lack of viable alternatives and fear for his and his family's safety. The prosecution argued that Godinez's actions, combined with purported demonstrations of a treasonous adherence to the enemy, made him guilty as charged.

Upon conviction by the trial court, Godinez appealed to the Supreme Court of the Philippines, challenging the sufficiency of the evidence against him and arguing that his actions were dictated by survival rather than allegiance to the enemy.

****Issues**:**

1. Whether mere governmental work or services rendered under the Japanese occupation constituted per se acts of disloyalty indictable as treason.
2. Whether the acts and alleged expressions of admiration or support for the Japanese by Godinez proved a treasonous intent beyond a reasonable doubt.

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

The Supreme Court thoroughly analyzed each allegation against Godinez, evaluating whether his expressed sentiments or acts signified a genuine allegiance to the enemy warranting a conviction for treason. The Court found the evidence insufficient to prove beyond a reasonable doubt that Godinez acted with treasonous intent. Specifically, it pointed out that adherence to the enemy could not be conclusively inferred from mere compliance with occupational demands or from casual remarks made under duress or during distressing circumstances.

The Court highlighted the importance of discerning motive in cases of alleged treason during enemy occupation, referencing a statement by President Osmeña emphasizing the need for a fair and dignified resolution of such cases based on the individuals' motives rather than merely their actions.

Ultimately, the Supreme Court acquitted Jose Luis Godinez, emphasizing that the prosecution failed to establish beyond reasonable doubt his disloyal heart or treacherous mind.

****Doctrine**:**

The Supreme Court's decision in this case reiterates the principle that for acts during an enemy occupation to constitute treason, there must be clear evidence of an intent to betray, not only compliance with the occupier's directives out of necessity or duress. This emphasizes a discerning approach to evaluating acts of alleged disloyalty during times of occupation, highlighting the significance of motive and intent.

****Class Notes**:**

- ****Treason****: Defined as giving aid or comfort to the enemy with treasonous intent.
- ****Intent and Motive****: Critical in assessing the guilt of individuals accused of treason, especially during enemy occupation.
- ****Evidence****: Must prove beyond reasonable doubt both the act of adherence to the enemy and the intent to betray.
- ****Duress and Necessity****: Acts performed under these conditions, unless accompanied by clear evidence of a traitorous intent, do not per se constitute treason.

****Statutory Provisions**:**

- The decision demonstrates the application of principles consistent with the Philippine Revised Penal Code and the jurisprudence on treason, specifically focusing on the necessity of establishing intent to betray beyond a reasonable doubt.

****Historical Background**:**

This case reflects the complex legal and moral dilemmas faced by individuals who lived and worked under Japanese occupation during World War II. It underscores the judiciary's role in post-war society to carefully adjudicate cases of alleged collaboration, distinguishing between survival strategies and genuine acts of treason, in the broader effort to heal and rebuild the nation.