

**\*\*Title:** The People of the Philippines vs. Dominador Camerino, et al.\*\*

**\*\*Facts:\*\***

Between October and November 15, 1953, Dominador Camerino and eighty-six others were charged before the Court of First Instance of Cavite with sedition, allegedly committed through acts against members and sympathizers of the Nacionalista Party in Bacoor, Cavite, to disturb the free expression of the popular will in the November 10, 1953 elections. The information provided detailed descriptions of seditious acts across fourteen different occurrences. Before arraignment, forty-eight defendants, led by Camerino, filed a motion to quash the information on double jeopardy, furthering this with a supplemental motion questioning the multiplicity of offenses charged and claiming extinguishment of criminal action or liability. The Fiscal opposed, clarifying that the detailed acts, although constituting separate crimes, collectively supported the sedition charge, not independent prosecutions. The trial court, however, upheld the motion to quash for reasons including multiplicity of offenses and prescription of some election law violations. The government appealed the decision.

**\*\*Issues:\*\***

1. Whether the information charged more than one offense, thus violating principles against the multiplicity of charges.
2. Whether detailing acts that could constitute separate offenses in the information for sedition invalidates the charge due to double jeopardy.

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

The Supreme Court set aside the orders of the trial court, holding that the information validly charged only a single offense - sedition. It clarified that although multiple acts constituting different crimes were detailed, they were narrated not to initiate separate prosecutions but to describe the collective behavior representing sedition as defined and penalized under Articles 139 and 140 of the Revised Penal Code. The Court referenced prior cases to emphasize the distinction between charging multiple crimes in one information versus detailing various acts to describe the nature of a single charge. Ultimately, the case was remanded to the trial court for further proceedings.

**\*\*Doctrine:\*\***

This case reiterates the doctrine that detailing separate criminal acts within a single charge does not constitute the charging of multiple offenses if those acts collectively describe the nature and elements of the single crime being prosecuted. It distinguishes between the

necessity to provide a comprehensive narrative of actions leading to a particular charge and the impermissibility of prosecuting an individual for multiple separate crimes within a single juridical proceeding without adhering to the principles of specificity and double jeopardy.

**\*\*Class Notes:\*\***

- **\*\*Multiplicity of Charges:\*\*** An information should not charge more than one offense, except for specific exceptions allowed by law.
- **\*\*Sedition vs. Separate Crimes:\*\*** Acts constituting separate crimes can be detailed within a charge of sedition to provide a full narrative of the conduct amounting to sedition, without separately charging those crimes.
- **\*\*Double Jeopardy:\*\*** Double jeopardy protects against being tried twice for the same offense but does not preclude detailing several acts within one charge if they collectively define the crime.
- **\*\*Doctrine of Specification in Criminal Charges:\*\*** Detailing acts constituting separate crimes is permissible as a narrative method to describe the nature of a bigger singular offense being charged, such as sedition.

**\*\*Historical Background:\*\***

This case highlights the seriousness with which political and social activism, when perceived as seditious, was judicially treated in the Philippines during the mid-20th century. It reflects the tension between safeguarding the state and governing authority from tumultuous disturbances and respecting individuals' rights to protest and political expression. Moreover, it showcases the procedural and doctrinal nuances in Philippine criminal law, particularly concerning the concept of sedition and the allowable breadth in charging individuals with crime.