

Title: Mel Dimat vs. People of the Philippines

Facts:

The case centers around Mel Dimat, who was charged with violating the Anti-Fencing Law. This accusation arose following a transaction in which Dimat sold a 1997 Nissan Safari to Sonia Delgado for PHP 850,000 in December 2000. The vehicle was later identified as stolen property, having been carnapped in May 1998 from its registered owner, Jose Mantequilla. The discovery was made by police officers in March 2001 after spotting the vehicle with a suspicious plate number in Quezon City and confirming its status as stolen through its engine and chassis numbers, which matched the stolen vehicle's records but not the details in the deed of sale presented by Dimat.

Dimat contended that he purchased the vehicle in good faith from Manuel Tolentino and was unaware of any issues concerning its legality. He relied on documentation that later proved incongruent with the vehicle's legitimate details. After being convicted by the Manila Regional Trial Court (RTC) and having his conviction affirmed by the Court of Appeals (CA) with a slight modification to his sentence, Dimat appealed to the Supreme Court.

Issues:

The primary legal issue revolves around whether Dimat knew or should have known that the Nissan Safari he transacted was stolen, which is a crucial element in establishing guilt under the Anti-Fencing Law.

Court's Decision:

The Supreme Court affirmed the CA's decision, concluding that Dimat was indeed guilty of fencing. The Court noted several critical points leading to its decision: the discrepancy between the vehicle's actual engine and chassis numbers and those listed in the deeds of sale; Dimat's claim of ignorance not being a valid defense under the concept of *malum prohibitum*, which applies to violations of special laws like the Anti-Fencing Law; and the circumstances of his acquisition and sale of the vehicle, suggesting he should have known it was stolen. Ultimately, the Court found sufficient evidence that Dimat knew or should have known the illicit origin of the Nissan Safari, thereby affirming his conviction under the Anti-Fencing Law.

Doctrine:

The Supreme Court in this case reiterated the elements of "fencing" under Philippine law and emphasized that violations of the Anti-Fencing Law are considered *malum prohibitum*,

where criminal intent is not a requisite for guilt. The Court underscored the principle that dealing in any property known or should have been known to be derived from theft or robbery constitutes fencing, with the intent to gain being a critical factor in establishing guilt.

Class Notes:

- Essential Elements of Fencing: (1) A robbery or theft has been committed; (2) The accused was not involved in the theft or robbery but deals in property resulting from said crime; (3) The accused knows or should have known the property was derived from a crime; (4) There is intent to profit from the transaction.
- Concept of Malum Prohibitum: In violations of special laws like the Anti-Fencing Law, the government need not prove criminal intent. Guilt is established by the mere commission of the prohibited act.
- Due Diligence in Transactions: This case highlights the importance of verifying the legality of items to be purchased or sold, especially concerning property documentation.

Historical Background:

The Anti-Fencing Law, aka Presidential Decree No. 1612, was enacted to curb the selling and buying of stolen property, a crime often connected to theft and robbery. Fencing is criminalized under this decree to deter individuals from profiting off or facilitating the circulation of stolen goods, thereby assisting in the reduction of theft and robbery incidents by cutting off potential revenue for thieves. This case serves as a reminder of the stringent application of the Anti-Fencing Law in the Philippines and the responsibilities of sellers and buyers in ensuring the legitimacy of their transactions.