

****Title:**** The People of the Philippines vs. Moro Isnain

****Facts:****

On the morning of March 7, 1947, Urbano Cruz, the manager (encargado) of Arturo Eustaquio's coconut grove in Latuan and Balagtasan, Zamboanga City, received a report from Lazaro Viernes, a guard, that three individuals were stealing coconuts from the plantation. Cruz, accompanied by truck driver Ernesto Fargas and some laborers, went to the grove and saw three people chopping coconuts. As they approached, the trespassers fled, but Cruz fired a warning shot, prompting one to stop. This individual was identified as Moro Isnain.

Isnain, during an investigation led by Lt. Bucoy, the precinct commander, admitted his guilt, sought pardon, and identified his accomplices as Moros Addi and Akik, who remained at large. Despite initially pleading guilty before the justice of the peace, Isnain retracted his plea in the Court of First Instance, stating he had only gone to the plantation to drink coconut water due to thirst. Nevertheless, Isnain admitted to drinking the coconut water with the other two and asked for Lt. Bucoy's forgiveness by even kissing his hand.

The value of the stolen coconuts amounted to Php 33.76.

****Procedural Posture:****

Isnain pleaded guilty before the justice of the peace but entered a not guilty plea in the Court of First Instance, claiming his presence at the grove was due to thirst rather than intent to steal. The case progressed to the Court of First Instance, where he was convicted. Isnain, through his attorney de officio, appealed primarily on constitutional grounds, questioning the harsher penalties for coconut theft under Article 310 of the Revised Penal Code compared to other produce thefts.

****Issues:****

1. Whether Article 310 of the Revised Penal Code classifying coconut theft as qualified theft, with a heavier penalty, violates the equal protection clause of the Constitution.
2. Whether the conviction and sentencing of Isnain were valid under the applicable laws.

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

1. ****Equal Protection Clause:****

- The Court held that while the Constitution mandates equal protection, it allows for reasonable classifications by the state under its police power. Creating different punishments to address specific societal problems, such as the theft of coconuts which are

pivotal to the national economy and difficult to protect due to the nature of coconut groves, is within the state's discretion.

- The Court cited that classifications are constitutional if they are reasonable and applied equally within the same class. Since the protection of the coconut industry provides a rational basis for the harsher penalties, Article 310 does not violate the equal protection clause.

2. **Conviction and Sentencing:**

- The theft committed by Isnain falls under Article 309, paragraph 5, in conjunction with Article 310 of the Revised Penal Code, rendering the heavier penalty applicable.

- The court modified the sentence according to the Indeterminate Sentence Law, imposing a prison term ranging from a minimum of four months of *arresto mayor* to a maximum of four years and two months of *prision correccional*. Thus, the court affirmed the conviction with modifications to the sentence.

Doctrine:

- **Equal Protection Clause:** This case reiterated that the state can impose different penalties for similar acts if there is a reasonable and justifiable basis for such a classification, particularly to protect significant national industries.

- **Qualified Theft:** Stealing coconuts is considered qualified theft due to the special protection afforded to the coconut industry under Article 310 of the Revised Penal Code.

Class Notes:

- **Key Legal Concepts:**

- **Qualified Theft (Article 310, Revised Penal Code):** Theft of certain products (e.g., coconuts) carries enhanced penalties.

- **Equal Protection Clause:** Allows reasonable classifications; laws can vary penalties if justifiable grounds exist.

- **Indeterminate Sentence Law:** Sentences should have a minimum and maximum range ensuring proportionality in punishment.

- **Relevant Statutes:**

- **Article 309, Revised Penal Code:** Theft offenses and their corresponding penalties.

- **Article 310, Revised Penal Code:** Classifications of theft into qualified theft, with more severe penalties for specific items like coconuts.

- **Application:**

- Explained the constitutionality of varying penalties for theft based on product and protection necessity.
- Demonstrated the judicial process for adjusting sentences according to the Indeterminate Sentence Law.

****Historical Background:****

- The case arose from post-World War II Philippines, a period focused on economic recovery and agricultural development. The decision reflects judicial efforts to protect vital sectors such as the coconut industry, crucial to the national economy at that time. The enhanced penalties aim to deter theft in less supervisable, yet economically significant, coconut groves, supporting the national economic agenda.