

**\*\*Title: United States v. Maleza and Adlaon\*\***

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

On May 31, 1906, Luciano Maleza, acting as the Treasurer of the municipality of Sevilla in the Province of Bohol, certified a financial statement indicating payments made to carpenters and day laborers for work on the municipal building during 1903 and 1904. This statement, approved by the municipal council, asserted that the payments amounted to P249.35 for necessary public works and materials purchased. Maleza and Gabriel Adlaon, who was noted as the receiver of these funds, signed the document, affirming its accuracy.

However, contrary to the claims in the certification, the funds were not paid to the carpenters but instead were drawn and paid to Maleza himself. Maleza had been commissioned by P. Cayetano Bastes to collect the money Bastes had loaned to the municipal president and treasurer of Sevilla in 1903. Adlaon had falsely certified receipt of these funds.

As a result, the provincial fiscal filed a complaint against Maleza and Adlaon, charging them with falsification of a public document due to reckless negligence. The defendants' counsel demurred, contending the complaint's insufficiency, improper legal drawing, and potential multiplicity of charges.

On October 7, the trial court sustained the demurrer, arguing that falsification by reckless negligence was not a recognized crime. The fiscal appealed this decision to the Supreme Court.

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

1. **\*\*Whether falsification of a public document by reason of reckless negligence constitutes a crime under Philippine law.\*\***
2. **\*\*Whether the demurrer sustained by the trial court was correct.\*\***

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

1. **\*\*Crime of Falsification by Reckless Negligence:\*\*** The Supreme Court found that falsification by reckless negligence does constitute a crime. Citing Article 568 of the Penal Code, the Court clarified that actions executed without malice or criminal intent but with negligence that results in harm are punishable. This includes recklessness that, if done with malice, would constitute a grave crime.

The Court acknowledged that negligence, as an intermediate act between intentional and

unintentional actions, warrants punishment albeit to a lesser degree. Such negligence should be evaluated based on foresight, carelessness, and prudence expected of an individual to prevent social or individual harm.

2. **Reversal of the Trial Court's Decision:** Given these considerations, the Supreme Court held that the trial court's decision to sustain the demurrer was incorrect. It emphasized that the Penal Code's provisions on negligence—including instances from Spanish law—apply, justifying the legal basis for charges of falsification by reckless negligence.

Accordingly, the Court ordered the reversal of the trial court's decision and remanded the case for further proceedings consistent with the law.

**Doctrine:**

- **Falsification of Documents by Reckless Negligence:** Actions done without malice or criminal intent but with lack of foresight, carelessness, or negligence—resulting in societal or individual harm—are punishable. Article 568 of the Penal Code encompasses such acts, distinguishing between degrees of negligence and their consequent penalties based on the severity of the resultant crime.

**Class Notes:**

- **Elements of Falsification by Reckless Negligence:**
- Execution without malice or criminal intent.
- Lack of foresight, carelessness, or negligence.
- Actions resulting in harm to society or individuals.
- Punishment varies based on the material outcome and seriousness of the negligence.
- Article 568 Penal Code: Essential legal provision outlining penalties for negligence leading to grave and less grave crimes.

**Historical Background:**

The case unfolded in a historical context of evolving legal standards in the Philippines, which were transitioning from Spanish-influenced legal codes to those implemented by American colonial authorities. During this era, legal interpretations, especially concerning negligence and administrative wrongdoings, were pivotal in establishing jurisprudence under the new regime. The case exemplifies the integration and application of existing Spanish Penal Code doctrines within the Philippine legal system during the early 20th century.

**Key Citation:**

- Article 568 of the Penal Code setting the punishment for acts executed through reckless negligence that would constitute a grave or less grave crime if done with malice.

This careful analysis allows for easy recall and differentiated understanding of the integral legal principles and historical context influencing the Court's decision.