

****Title:**** People of the Philippine Islands vs. Gregorio Perfecto, 43 Phil. 887 (1920)

****Facts:****

1. On or around August 20, 1920, Fernando M. Guerrero, Secretary of the Philippine Senate, discovered that documents related to an investigation of oil companies had disappeared from his office.
2. On September 7, 1920, during a special Senate session called by the Governor-General, Guerrero informed the Senate about the loss and the ongoing investigation.
3. The next day, Gregorio Perfecto, editor of the newspaper *La Nacion*, published an article implying that the Senate itself could be involved in the disappearance and questioning the integrity of some Senators, suggesting electoral fraud.
4. The Philippine Senate, on September 9, 1920, resolved to have its committee on elections and privileges review the appropriate action regarding the article.
5. On September 15, 1920, the Senate authorized its President to refer the case to the Attorney-General.
6. A municipal court of Manila found Perfecto guilty of violating Article 256 of the Spanish Penal Code, a judgment that was upheld by the Court of First Instance of Manila.
7. Perfecto appealed to the Supreme Court of the Philippines, claiming multiple errors including the constitutional validity of Article 256 under American sovereignty.

****Issues:****

1. Whether Article 256 of the Spanish Penal Code, regarding defamation of persons in authority through writing, is still in force.
2. Whether the Libel Law (Act No. 277) has repealed Article 256 insofar as it pertains to written defamation.
3. Whether the change from Spanish to American sovereignty in the Philippines has abrogated Article 256 because it is inconsistent with democratic principles of governance.

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

1. ****Effect of the Libel Law:****

- The majority of the Court opined that the Libel Law (Act No. 277), enacted by the Philippine Commission, effectively repealed Article 256 insofar as it pertains to written defamation. They argued that the Libel Law was a comprehensive replacement for previous provisions governing defamation and insult, thereby abrogating any conflicting provisions of the Spanish Penal Code.

2. **Change in Sovereignty:**

- Three Justices were of the opinion that Article 256 was abrogated entirely by the change from Spanish to American sovereignty. They stated that the article was inconsistent with the democratic principles of the American government, and its enforcement was contrary to the freedoms guaranteed by the American legal system.
- Chief Justice Araullo concurred in the disposition of acquitting Perfecto but emphasized that while Article 256 remained partially in force for verbal insults and contempt, it was repealed by the Libel Law for written and printed offenses.

Given these interpretations, the Supreme Court of the Philippines unanimously reversed the lower courts' decisions and acquitted Gregorio Perfecto of violating Article 256, with costs de officio.

Doctrine:

1. **Repeal by the Philippine Libel Law:**

- Act No. 277, the Philippine Libel Law, repealed Article 256 of the Spanish Penal Code insofar as it relates to written defamation, covering the whole subject matter of libel comprehensively and thereby superseding prior inconsistent laws.

2. **Applicability Post-Sovereignty Change:**

- Laws enacted under Spanish sovereignty inconsistent with American democratic principles are considered abrogated following the transfer of sovereignty to the United States.

Class Notes:

1. **Repeal of Prior Law:**

- Emphasize the rule of statutory construction where newer comprehensive legislation repeals prior conflicting laws by implication.

2. **Change in Sovereignty:**

- Discuss the principle that acquisition of territory by a new sovereign leads to the abrogation of prior political and sovereignty-related laws incompatible with the new regime.

3. **Libel and Freedom of the Press:**

- Review the comprehensive nature of the Libel Law in the context of defamation, particularly written defamation, under American legal principles protecting free speech and press.

4. **Statutory Interpretation:**

- Refer to key cases like *U.S. vs. Helbig*, and the perspective on municipal vs. political laws, as well as the contemporary transition from the Spanish Penal Code to applicable American-influenced governance standards in the Philippines.

Historical Background:

This case occurred during a significant transitional period in Philippine legal history. Following the Spanish-American War and the Treaty of Paris in 1898, the Philippines came under American sovereignty. The judiciary faced challenges reconciling the previously enforced Spanish legal codes with American principles of democracy and liberties. This historical context underpins the Court's reasoning in determining the inapplicability of certain colonial laws post-sovereignty transition, reflecting an evolving legal landscape oriented towards American constitutional values.