

Title: The United States vs. Canuto Butardo

Facts:

- Background and Accusation:** On August 25, 1903, the provincial fiscal of Ilocos Norte filed a complaint against Canuto Butardo in the Court of First Instance for administering and consenting to the administration of an oath to defend against the U.S. Government and maintain secrecy, as outlined in Act No. 292 by the Civil Commission.
- Incident Description:** Around late June to early July 1903, Butardo, along with Valentin Butardo and Eulalio Diaz, abducted Pablo Pacoy, Juan Navarro, and Mateo Cacpal into a forest. The victims were blindfolded, threatened with death, made to kneel, repeat an oath to defend the country, and endure an incision on their arms.
- Secret Societies:** Witnesses testified that the defendant formed a group that took blood-oaths and aimed to establish a resistance against the U.S. administration. Documents with revolutionary content were found in Rosendo Echinique's possession.
- Trial and Judicial Proceedings:** Following the complaint, numerous witnesses were summoned. The lower court found Butardo guilty and sentenced him to six years of hard labor, fined him \$5,000 gold, and imposed adjudication costs.
- Appeal:** Butardo appealed the conviction, arguing differing intents and the ceremonial purpose being tied to societal or electoral customs and not rebellion.

Issues:

- Did Butardo's actions constitute the crime defined and punished under Section 12 of Act No. 292?**
- Was the purpose of the incisions and oath administration as recounted by witnesses a revolutionary act against the constituted government?**
- Could Butardo's defense of forming a lawful society with his acts as electoral customs hold grounds against charges of conspiracy?**

Court's Decision:

- Confirmation of Crime under Act No. 292:** The court concluded that Butardo's acts of threats, blindfolding, oath administration, and blood incisions aimed at secret defiance and rebellion against the U.S. Government fell under the defined crime in Section 12 of Act No. 292.
- Revolutionary Intent:** Despite Butardo's claims of promoting lawful societal organization, the secretive and coercive nature of his actions, along with the content of recovered documents calling for rebellion and violence, indicated a revolutionary motive and disturbance of public order.

3. **Rejection of Defense:** Examining the purported cultural claim of blood-oath within elections, the court found no evidence supporting such custom in municipal elections. The court deemed these as revolutionary acts consistent with Katipunan practices.

4. **Modification of Punishment:** Although affirming the guilt, the Supreme Court moderated the sentencing from six years to one year and reduced the fine from \$5,000 to 2,000 insular pesos, citing misclassification of the crime in the initial judgment.

Doctrine:

1. **Section 12 of Act No. 292:** The administration or consent to administer secret oaths for the purpose of resistance against governance or concealed undertakings is criminal.

2. **Disturbance to Public Peace:** Coercing individuals by threats into secret societies and revolutionary incursions violates public peace and government stability.

Class Notes:

1. **Elements of Crime:**

- Administration of oath.
- Secrecy mandated on the undertaking.
- Threats or coercion.
- Revolutionary or anti-government motive.

2. **Act No. 292, Section 12 (paraphrased):**

- Criminalizes threats and oath-administering for resistance against the government and demands secrecy in these legitimacies.

Historical Background:

- The case occurred during the American colonial period in the Philippines. Resistance to U.S. rule was common post-Philippine-American War, with various groups, including remnants of the Katipunan society, opposing the new administration. The case highlights the efforts of the U.S. to quell dissent and enforce sovereignty through legal actions against perceived insurgent activities.