

Title: Cecilio Pe, et al. vs. Alfonso Pe

Facts:

Plaintiffs Cecilio Pe, et al., who are the parents, brothers, and sisters of Lolita Pe, brought an action before the Court of First Instance of Manila to recover moral, compensatory, exemplary, and corrective damages amounting to P94,000.00. Defendant Alfonso Pe, a married man working as an agent of La Perla Cigar and Cigarette Factory, was close to the plaintiffs, whom he frequented under the pretext of learning how to pray the rosary from Lolita.

The love affair between Alfonso and Lolita started around 1952, with secret trysts continuing until 1955, despite attempts by Lolita's parents to end it, including filing deportation proceedings against Alfonso, a Chinese national. In April 1957, Lolita, staying at 54-B España Extension, Quezon City, disappeared without a trace, leaving behind a note suggesting a rendezvous with Alfonso.

The plaintiffs claim under Article 21 of the Civil Code, alleging that Alfonso's affair with Lolita caused them injury contrary to morals, good customs, and public policy. The trial court dismissed the complaint, finding no bad faith on Alfonso's part and lacking deliberate inducement of the illicit relationship.

Issues:

1. Whether the defendant's actions constituted a willful injury to the plaintiffs under Article 21 of the Civil Code.
2. Whether the absence of bad faith or deliberate inducement negates the claim for damages.

Court's Decision:

1. **Willful Injury Under Article 21:** The Supreme Court disagreed with the trial court's reasoning, finding that the circumstances demonstrated deliberate and calculated efforts by Alfonso to seduce and win Lolita's affection. Alfonso's consistent visits using the pretext of religious instruction, persistence despite deportation filing, and clandestine meetings illustrated willful actions contrary to morals and public policy, qualifying for a claim under Article 21.
2. **Absence of Bad Faith:** The Court found that Alfonso's actions showed bad faith and intentional inducement, rejecting the lower court's presumption that the affair could be a mutual, unintentional emotional development. The Court emphasized the clever strategy

employed by Alfonso to corrupt Lolita, a married man engaging with an unmarried woman within the family context, aggravating the injury.

The Supreme Court reversed the trial court's decision, affirming that Alfonso's actions were indeed contrary to morals, good customs, and public policy. Hence, Alfonso was ordered to pay P5,000 in damages and P2,500 as attorney's fees and litigation expenses to the plaintiffs.

Doctrine:

The doctrine reiterated in this case illustrates that actions causing injury, particularly within familial and societal contexts, grounded in deliberate deceit and bad faith, incur liability under Article 21 of the Civil Code. This extends protection against injuries stemming from conduct contravening moral, customary, and public policy norms.

Class Notes:

- **Article 21, Civil Code:** Any willful cause of loss or injury to another contrary to morals, good customs, or public policy merits compensation.
- **Key Elements:** Willful action, injurious consequence, contravention of moral and public policy standards.
- **Principles Applied:** Deliberate deceit and calculated inducement of immoral conduct ground liability for moral damages, even in the absence of direct physical harm, evaluated against societal norms.
- **Critical Statutory Provision:** Article 21, reinforcing accountability for socially and ethically improper conduct causing injury.

Historical Background:

This case reflects a conservative societal context in the Philippines during the 1950s-60s, where moral and familial values held strong legal and social significance. Relationships violating these standards, especially involving deceit and familial betrayal, were severely judged, highlighting the protective legal framework around family honor and moral conduct.