

Quinao vs. People of the Philippines

Title:

Conchita Quinao vs. People of the Philippines, et al.

Facts:

Initial Incident and Filed Informational Charge:

On February 2, 1993, around 9:00 AM at Sitio Bagacay, Barangay Potong, Lapinig, Northern Samar, Conchita Quinao and Salvador Cases were accused of usurping and occupying a property owned by Francisco Del Monte using force and intimidation. They reportedly converted 12,000 coconuts into copra, selling it for PHP 14,580 to Del Monte's detriment.

Legal Proceedings:

Quinao and Cases pleaded not guilty during their arraignment. During the litigation, both Del Monte and the accused claimed ownership of the disputed land. Del Monte presented Tax Declaration No. 1202, showing his claim traces back to a Civil Case No. 3561 adjudicating the property to his predecessor. Quinao and Cases presented Tax Declaration No. 1195 under Lorenzo Cases, alleging the land they claimed was different from that in Civil Case No. 3561.

Trial Court Ruling:

The trial court found Quinao and Cases guilty of usurpation of real property under Article 312 of the Revised Penal Code and imposed a fine of PHP 174,960 based on the gain from forcibly taking and utilizing the property from Francisco Del Monte for three years. Cases died before the conclusion of his appeal, leaving Quinao to appeal the decision to the Court of Appeals (CA).

Court of Appeals Handling:

The CA affirmed the trial court's decision. When Quinao filed a motion for reconsideration, the CA denied this motion as well.

Observations and Allegations by Petitioners:

Petitioner raised issues including her advanced age as a defense against the charge of conspiracy and disputed the force and intimidation claims. She also asserted ownership of the disputed property.

Supreme Court Review:

Petitioner appealed to the Supreme Court to review the CA's decision.

Issues:

1. Whether the advanced age of the petitioner can negate her liability for usurpation.
2. Whether the alleged force and intimidation in usurping the property were sufficient for conviction.
3. Whether petitioner's claim of ownership of the land could shield her from liability for usurping her own property.

Court's Decision:

The Supreme Court found the appeal without merit and stated:

****Advanced Age Defense:****

The argument of petitioner's advanced age did not exculpate her involvement as the trial court's conviction was based on solid evidence.

****Force and Intimidation:****

The Court affirmed that violence and intimidation were indeed employed during the usurpation based on witness Bienvenido Del Monte's credible testimony.

****Property Ownership Claim:****

It was found that the ownership of the land had been settled in favor of Francisco Del Monte's predecessor through Civil Case No. 3561. The commissioner appointed by the trial court confirmed the land claimed by petitioner overlapped with the land adjudicated in Civil Case No. 3561.

The Supreme Court upheld that the trial court and CA were correct in finding that the petitioner's actions met all elements of usurpation, including intent to gain.

Doctrine:

Article 312 of the Revised Penal Code defines usurpation of real property as taking possession of real property belonging to another with violence or intimidation, punishable by a fine relative to the gain obtained. The case reinforced the necessity to respect prior judicial determinations of property ownership.

Class Notes:

- ****Real Property Usurpation Elements:****

1. Occupation of another's property or usurpation of real rights over it.

2. Violence or intimidation employed.

3. Intent to gain.

- **Evidence of Previous Ownership:**

Tax declarations and court decisions are critical evidence.

- **Res Judicata:**

Final judgments in civil cases (like Civil Case No. 3561) are binding regarding property issues.

- **Credibility of Witnesses:**

Eyewitness accounts are crucial, especially those establishing violence or intimidation.

Statutory Reference:

Article 312 of the Revised Penal Code.

Historical Background:

The case highlights longstanding property disputes in rural Philippines, where land ownership often leads to violence and judicial conflict. It underscores historical tensions and the role of judicial systems in resolving such disputes. The decision reinforces deterrents against illegal land occupation and expropriation, addressing the cultural and legal implications of land ownership in the Philippines.