

Title:

People of the Philippine Islands v. Amadeo Corral, 62 Phil. 945 (1935)

Facts:

1. **Incident**: Amadeo Corral was charged with illegal voting in the general elections held on June 5, 1934.
2. **Past Conviction**: Corral had been sentenced on March 3, 1910, by final judgment to eight years and one day of presidio mayor for a crime.
3. **Existing Law**: Section 432 of the Revised Administrative Code disqualified any person sentenced to suffer not less than 18 months of imprisonment from voting unless granted a plenary pardon.
4. **Action**: No evidence showed that Corral had received a plenary pardon before June 5, 1934.
5. **Behavior**: Despite his disqualification, Corral voted in election precinct No. 18, Davao, in the general elections on June 5, 1934.

Procedural Posture:

1. **Trial Court**: Corral was tried and convicted under Section 2642, in connection with Section 432 of the Revised Administrative Code, for voting while laboring under a legal disqualification.
2. **Appeal**: Corral appealed the conviction to the Supreme Court of the Philippines.

Issues:

1. **Validity of Disqualification**: Whether Corral's disqualification from voting under Section 432 continued despite his previous service of sentence and lack of a plenary pardon.
2. **Continuous Nature of Disqualification**: If the disqualification due to conviction is continuous unless removed by a plenary pardon.
3. **Prescription of the Offense**: Whether Corral's act of voting in 1928 nullified subsequent charges for illegal voting in 1934.
4. **Interpretation of Disability Duration**: Whether the disqualification should be considered lifted upon the completion of the sentence.

Court's Decision:

1. **Continuation of Disqualification**: The Supreme Court ruled that Corral's disqualification continued and was valid unless removed by a plenary pardon. Voting under Section 432 remained illegal as Corral had no plenary pardon.
2. **Nature of Disqualification**: The Court determined that the disqualification was

imposed not as punishment but for the protection of the electoral process, thereby affirming its continuous nature post-sentencing without explicit removal.

3. **Prescription Argument Rejected**: The Court rejected the argument that Corral's offense had prescribed, stating his previously voting act (1928) did not nullify the disqualification still valid in 1934.

4. **Validity of Lifetime Disqualification**: The Court interpreted the disqualification as applying throughout the life of the convict if no plenary pardon was granted.

Doctrine:

- **Continuous Disqualification Doctrine**: A legal disqualification from voting pursuant to Section 432 cannot be deemed removed just by the completion of the sentence. Without a plenary pardon, the said disqualification is continuous and applicable indefinitely.

- **Suffrage as Privilege**: The right to vote, considered as a privilege granted by the state, can be regulated and restricted as deemed necessary for maintaining the integrity of the electoral process.

Class Notes:

- **Key Elements**:

1. **Disqualification from Voting**: Certain crimes lead to permanent disqualification under Section 432 of the Revised Administrative Code unless a plenary pardon is granted.

2. **Imprisonment and Voting Rights**: Imprisonment terms of 18 months or longer result in loss of voting rights that extend beyond sentence completion.

3. **Election Laws Compliance**: Engaging in voting despite disqualification can result in further legal penalties.

- **Statutory Provisions**:

- **Section 432, Revised Administrative Code**: Lists persons disqualified from voting, including those sentenced to lengthy imprisonment without a plenary pardon.

- **Section 2642, Revised Administrative Code**: Sets penalties for illegal voting, encompassing fines and imprisonment.

Historical Background:

At the time of Amadeo Corral's conviction in 1910, the Philippines was under American colonial rule, exerting influence on legal structures, especially administrative and election laws structured to follow a protective model for suffrage. The suffrage disqualifications were stringent to counteract the use of votes by convicts, framed by the legal foundation that perceived the purity of the electoral process as paramount. With democratic principles

taking greater root, exclusions were re-evaluated, maintaining that protective disqualifications were imperative to uphold election integrity.