

THE UNITED STATES, PLAINTIFF AND APPELLEE, VS. CRISPINA GANZON, DEFENDANT AND APPELLANT.

G.R. No. 10319. February 26, 1915

Ponente: CARSON, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-10319/>

CARSON, J.:

This is an appeal from a judgment of the Court of First Instance of Bataan, convicting the defendant and appellant of the crime of injurias graves (grave insults), and sentencing her to six months and one day of destierro, whereby she is denied the right to approach within a radius of twenty-five kilometers [from] the municipal building of the town of Abucay, and further to pay a fine of 225 pesetas and the costs of the trial.

After a careful review of all the evidence of record we think it is clear that the defendant, a woman who kept a tienda in her native town, had a bitter altercation with the complaining witness of this case, a woman named Maximina Mina; that in the course of this quarrel offensive and scurrilous epithets were hurled by each of the parties against the other in the heat of passion and without taking thought of the highly offensive character of the language used. We are satisfied that this offensive language was not intended to be taken in its literal sense, and that neither of the parties so understood it. They seem simply to have searched their memories for insulting and offensive expressions by which they could relieve their feelings of rage and animosity. Doubtless if some of the language used were deliberately applied by one woman with reference to another, it would constitute the grave insults (injurias graves) mentioned in the statute, but we think that used as this language was, without any reference to its real meaning and under all the circumstances, it should be treated rather as language constituting the misdemeanor defined and penalized in article 589 of the Penal Code.

The conduct of which this defendant was shown to be guilty amounted, to our mind, to a mere misdemeanor, and the charges against her should properly have been brought in the court of the justice of the peace.

We conclude therefore that the judgment convicting her of the crime of injurias graves should be reversed, and in lieu thereof we find her guilty of the misdemeanor defined in article 589, subsection 1, and sentence her to pay a fine of 25 pesetas, with the costs of both instances de officio except that defendant will be required to pay the costs of a juicio verbal, that is to say, the legal costs taxed in all cases of conviction upon a prosecution for misdemeanor in the courts of the justices of the peace. So ordered.

Arellano, C. J., Torres, Johnson, Moreland, Trent, and Araullo, JJ., concur.

ABOUT BATAS.ORG

Study smarter at BATAS.org

The Philippine bar review and law-school companion built around how your brain actually remembers.

The complete Philippine law library - free for everyone.

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

Audio case-brief lectures.

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

Bar review built on the science of memory.

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

The full law-school curriculum.

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

Mock exams that tell you where you stand.

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

A study planner that keeps you on pace.

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

Start free at <https://batas.org>

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.