

Title: Aniceto C. Ocampo vs. Court of Appeals and People of the Philippines (University of the Philippines)

Facts:

On August 15, 1984, the U.P. Police Force received a tip about unauthorized construction activities at the U.P. Arboretum. Officers Villanueva, Ladip, and Ernesto were dispatched to investigate. They discovered Aniceto Ocampo overseeing construction. Upon inquiry, Ocampo admitted having no building permit, alleging he bought the land from Roberto Pael. The officers informed Ocampo that the land belonged to the University of the Philippines and instructed him to stop. Although he initially complied, Ocampo resumed construction on August 24, ignoring the earlier warning about violating Presidential Decree No. 772 (Anti-Squatting Law).

Following preliminary investigation, a charge was filed against Ocampo on March 25, 1985, for violating the Anti-Squatting Law (Criminal Case No. Q-38997). Ocampo entered a “not guilty” plea. After the prosecution presented its case, Ocampo opted to file a motion to dismiss, arguing insufficient evidence of ownership due to the absence of a Transfer Certificate of Title, rather than presenting his evidence.

The trial court found Ocampo guilty on October 7, 1985, emphasizing the sufficiency of evidence proving Ocampo’s lack of ownership and occupancy against U.P.’s will. Ocampo appealed to the Court of Appeals, which upheld the lower court’s decision.

Issues:

1. Does the prosecution’s failure to present evidence of ownership critically affect the court’s determination of guilt beyond a reasonable doubt under the Anti-Squatting Law?
2. Does filing a motion to dismiss after the prosecution rested bar Ocampo from later presenting his defense evidence?

Court’s Decision:

1. The Supreme Court held that proving U.P.’s ownership with a Transfer Certificate of Title was unnecessary for convicting Ocampo under Presidential Decree No. 772. The case hinged on Ocampo’s non-ownership and unauthorized occupation, both elements clearly established. The court emphasized that public and testimonial knowledge of the land belonging to U.P. was sufficient, given Ocampo’s inability to prove ownership.

2. On the second issue, the Court affirmed that Ocampo’s failure to request express leave before his demurrer to evidence meant waiving the right to present further evidence. The

Supreme Court applied the amended Section 15, Rule 119 of the Rules on Criminal Procedure, which, although enacted post-trial, was deemed procedural and hence retrospective. The Court validated that this procedural oversight effectively left the decision to be made solely on the prosecution's evidence.

Doctrine:

Presidential Decree No. 772 (Anti-Squatting Law) primarily examines the nature of occupancy, non-ownership, and unauthorized construction rather than the complainant's proof of ownership with title evidence. Procedural laws affecting court proceedings apply retroactively to pending cases, adhering to the principle that procedural rules are retrospective.

Class Notes:

- Elements of squatting under Presidential Decree No. 772 include: (1) Non-ownership by the accused, (2) Unauthorized occupation without or against landowner's consent, (3) Occupancy due to owner's absence or neglect toleration.
- Retroactive application of procedural amendments is upheld where procedural integrity is undisturbed.
- In criminal procedure, filing a demurrer without prior leave results in waiver of the right to submit evidence.

Historical Background:

Presidential Decree No. 772 was enacted during Martial Law (1972) by then-President Ferdinand Marcos, aimed to curb rampant illegal squatting in urban areas. The case reflects societal land disputes and adjudication complexities, particularly affecting institutions like universities safeguarding land for educational purposes. This policy underscores the historical socioeconomic tensions between development mandates and individual claims, central to urban development in the Philippines' bustling metropolises.