

Keeping Up with the Times: A Critique of *Corpuz v. People* and the Imposition of Penalties for Value-based Crimes

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On April 2014, the Philippine Supreme Court ruled on the issue of the imposition of the proper penalty for the felony of *estafa* under the Revised Penal Code (RPC) in the case of *Corpuz v. People*. Under the RPC, the imposable penalties for the crime of *estafa* is dependent on the value of the amount defrauded as fixed by the statute which is based on the values set by the Philippine Legislature in 1930. The ruling generated controversy because not only did it reinforce the continued imposition of the 84-year-old penalties for *estafa*, but it also generated a perceived injustice against those convicted of such felony. This perceived injustice was borne out of the fact that the fixed values set forth in the law did not adapt to the increase of prices throughout the years caused by economic inflation. The Author posits that the Court fell short in curing this to the detriment of not only the convicted but also other convicts languishing in prison for a similar crime.

This Comment endeavors to examine the ruling in *Corpuz* and discuss the legal grounds on why it is erroneous, thus ultimately resulting in unduly prolonging *Corpuz's* enjoyment of his liberty and unduly depriving other convicts similarly situated of their freedom.

The Author does this by first examining the facts, issues, and ratio of the case. The Author then goes into a discussion of how the Court, in this ruling, not only shirked from its duty of preventing injustice, but it also shunned the intent of the framers who drafted and approved the provisions of the RPC. The Author suggests that the Court should have interpreted the provision in favor of the right to liberty rather than being constricted with the doctrine of separation of powers and the fear of judicial legislation. To further support the Author's position, the Comment also goes into a discussion of relative constitutionality and how the ruling made the law arbitrary and inimical to the provisions of the Constitution. Through this, the Author then concludes that the Court failed its duty to interpret the law and give expression to its spirit in the context of facts. Despite this, however, the Author is optimistic that in time the Court will no longer turn a blind eye against the changes brought by the passage of time.