

****Title: Villareal vs. People of the Philippines, et al.****

****Facts:****

In February 1991, seven Ateneo de Manila University law freshmen expressed intent to join the Aquila Legis Juris Fraternity. The initiation rites began on February 8, 1991. Brutal hazing activities ensued, including physical beatings and psychological torment. On February 9, after enduring a day of hazing, the neophytes prepared for more rites. Non-resident and alumni members insisted on continuing the rites, and the neophytes were subjected to additional beatings, including “paddling.” Leonardo “Lenny” Villa exhibited signs of severe physical distress, eventually collapsing. Although initially thought to be overacting, it became apparent that he required immediate medical attention. Despite being rushed to the hospital, Villa was pronounced dead on arrival.

Consequently, criminal charges were filed against numerous fraternity members for homicide in two separate cases, one involving 26 defendants (Criminal Case No. C-38340(91)) and another against 9 defendants (Criminal Case No. C-38340). The Caloocan City Regional Trial Court (RTC) found all defendants in C-38340(91) guilty of homicide. On appeal, the Court of Appeals (CA) found distinctions in individual participation, absolving some while upholding the conviction of others, including Fidelito Dizon and Artemio Villareal for homicide, and four others, Antonio Mariano Almeda, Junel Anthony Ama, Renato Bantug Jr., and Vincent Tecson for slight physical injuries. The remaining group was acquitted. In a related case (CA-G.R. S.P. Nos. 89060 & 90153), the CA dismissed the criminal case against four other defendants for violations of their right to a speedy trial.

Following these developments, several petitions and motions were filed, eventually leading to the Supreme Court (SC) intervention where they modified the CA’s decision, found the primary respondents guilty of reckless imprudence resulting in homicide, and affirmed the acquittal of others on the grounds of speedy trial violations. The SC also sent a copy of the decision to the legislature recommending amendments to the Anti-Hazing Law.

****Issues:****

1. Whether the CA committed grave abuse of discretion in dismissing the case against some respondents for violation of their right to speedy trial.
2. Whether the penalty imposed on some respondents should have been equivalent to that for intentional felonies.
3. Whether respondents who were granted probation and later discharged had their criminal liability already extinguished.

****Court's Decision:****

1. The SC denied the motion for reconsideration concerning the CA's dismissal of the case for speedy trial violations, maintaining that the CA's decision did not involve grave abuse of discretion.
2. The SC denied the OSG's motion for reconsideration seeking to impose a higher penalty equivalent to intentional felonies, reiterating the distinction between malice or intent (*dolo*) and fault or negligence (*culpa*).
3. The SC declared all probation proceedings and judgments related to the granting of probation to some respondents null and void for lack of jurisdiction, but clarified that these respondents, along with Fidelito Dizon, are now eligible to apply or reapply for probation based on the SC's recent ruling in *Colinares v. People of the Philippines*.

****Doctrine:****

In cases of criminal liability due to fault or negligence (*culpa*) under Article 365 of the Revised Penal Code, malicious intent is not required as it would be in intentional felonies or those committed by means of deceit (*dolo*). The SC emphasizes the importance of distinguishing between *dolo* and *culpa* in criminal liability and in the imposition of penalties.

****Class Notes:****

- The Revised Penal Code provides for distinct penalties for offenses committed with malice (*dolo*) compared to those committed through negligence or imprudence (*culpa*).
- The Probation Law stipulates that the defendant who has appealed their conviction is disqualified from applying for probation (Presidential Decree No. 968, Section 4).
- A judgment becomes final when the accused waives the right to appeal, applies for probation, the sentence is satisfied or served, or after the lapse of the period for perfecting an appeal (Rules of Court, Rule 120, Section 7).

****Historical Background:****

This case stems from a tragic incident involving fraternity hazing that led to the death of a law student in the Philippines. It exemplifies the often-deadly consequences of violent initiation rites prevalent in some fraternities and the legal struggle that follows such events—highlighting issues involving the Anti-Hazing Law, the right to a speedy trial, and the application and interpretation of the Probation Law in the Philippine criminal justice system. Furthermore, it impacted the legislative discourse on hazing, prompting recommendations for legislative amendments to strengthen the Anti-Hazing Law.