

Title:

Rivera vs. People of the Philippines (Attempted Murder Case)

Facts:

On April 12, 1999, an Information was filed with the Regional Trial Court (RTC) of Imus, Cavite, accusing Esmeraldo, Ismael, and Edgardo Rivera of attempted murder following an assault on Ruben Rodil on May 3, 1998. The prosecution presented Ruben Rodil's testimony detailing an altercation on May 2, 1998, with Edgardo Rivera, followed by an attack on him the next day by all three Rivera brothers, where he was mauled and hit with a hollow block, sustaining injuries.

The Rivera brothers presented their defenses individually, each providing an alternative account of the events, suggesting a confrontation instigated by Ruben Rodil. The trial court found the Riveras guilty beyond reasonable doubt of frustrated murder, sentencing them to imprisonment. The brothers appealed to the Court of Appeals (CA), which modified the conviction to attempted murder, adjusting the penalties. The Riveras then filed a petition for review on certiorari with the Supreme Court of the Philippines.

Issues:

1. Whether the accused had the intent to kill the victim when they attacked him.
2. Whether the prosecution proved the element of treachery to justify the charge of murder.
3. Whether the accused should be held liable for attempted murder or merely for physical injuries due to the nature of the injuries sustained by the victim.

Court's Decision:

The Supreme Court analyzed the evidence and testimonies. The Court determined the intent to kill, given the nature of the coordinated violent act and use of a concrete hollow block. The superficial nature of Ruben Rodil's wounds did not mitigate the intention to kill. The Court affirmed the findings of the CA, disagreeing with the Rivera's claim that treachery was not established. The attack was both sudden and unexpected, rendering the victim unable to defend himself, which is the embodiment of treachery.

Regarding sentencing, the Court noted that while the CA properly convicted the Riveras of attempted murder, there was an error in the imposition of the indeterminate penalty. Applying the relevant provisions of the Revised Penal Code, the Court modified the penalty to an indeterminate sentence of two years of prision correccional in its minimum period to nine years and four months of prision mayor in its medium period.

Doctrine:

The doctrine established reinforces the principle that intent to kill can be inferred from the assailants' actions and the coordinated nature of the attack, and that superficial wounds do not negate criminal liability for attempted murder when intent is established. Additionally, the case upheld the concept of treachery, where a sudden and unexpected attack, even if frontal, that did not allow the victim to defend themselves could constitute treachery.

Class Notes:

Key Elements of Attempted Murder in the Philippines:

1. Intent to kill - established by the assailant's conduct and means used.
2. Treachery - an attack that is sudden and unexpected, giving no chance for the victim to defend, satisfying the requirement of treachery.
3. Overt Acts - overt action taken towards the commission of the crime after preparations have been made. In this case, the use of a hollow block to hit the victim.
4. Non-completion of Act - the failure to complete the crime was due to external factors, not by the offender's voluntary desistance.

Relevant Legal Provisions:

- Revised Penal Code
- Article 6: Defines an attempt to commit a felony.
- Article 51: The penalty to be imposed upon principals of attempted felonies.
- Article 248 (as amended by R.A. No. 7659): Defines murder and its penalties.
- Article 61 and Article 71: Direct the way to compute the degree of penalty.

Historical Background:

The historical context of this case highlights the judicial process in the Philippines regarding violent crimes and the intricacies of proving intent, treachery, and other elements that distinguish between various levels of criminal liability. The decision exemplifies the court's reliance on established jurisprudence and statutory law in determining both guilt and the appropriate penalties for attempted murder versus lesser offenses of physical injury.