

Title: Alfredo de Guzman, Jr. vs. People of the Philippines

Facts:

On December 24, 1997, at approximately 10 PM, Alexander Flojo was fetching water beneath his rented home in Mandaluyong City when Alfredo De Guzman, his landlady's brother, struck him on the nape. Alexander reported the incident to that landlady, Lucila Bautista, who apologized. At around midnight, Alexander resumed fetching water and was suddenly stabbed in the left face and chest by Alfredo. The assault was witnessed by Alexander's son-in-law, Cirilino Bantaya, who saw Alexander bleeding and helped transport him to the hospital. The medical intervention saved Alexander, who had sustained two stab wounds, one potentially fatal.

Alfredo argued, on the contrary, that there was a fistfight between him and Alexander, following an argument as Alfredo passed by Alexander who was fixing a motorcycle. He denied inflicting the stab wounds and asserted that an unknown individual could have been responsible.

The Regional Trial Court (RTC) found Alfredo guilty of frustrated homicide (Criminal Case No. 191-MD). Alfredo appealed to the Court of Appeals (CA), maintaining his innocence and questioning the intent to kill needed for frustrated homicide. The CA affirmed the RTC ruling. Unsatisfied, Alfredo filed a motion for reconsideration, which the CA denied on May 2, 2007.

Alfredo's petition to the Supreme Court followed thereafter, seeking a re-evaluation of the CA's and RTC's findings, specifically pertaining to intent to kill and the injection of reasonable doubt into the circumstances surrounding the injury Alexander sustained.

Issues:

1. Whether there was intent to kill on the part of Alfredo De Guzman.
2. Whether Alfredo De Guzman should be properly found guilty of frustrated homicide.
3. Whether the penalty and civil liabilities awarded were appropriate.

Court's Decision:

The Supreme Court dismissed Alfredo's appeal, affirming his conviction by the CA for frustrated homicide. The Court found that there was a clear intention to kill, which is evident by Alfredo's use of a deadly weapon that produced a fatal wound that would have led to death without medical intervention. The Court upheld that the lone testimony of a credible victim suffices for a conviction. It did alter the penalty to four years of prison

correccional, as the minimum, to eight years and one day of prision mayor, as the maximum.

In terms of civil liability, the Supreme Court revised the compensatory damages to include civil indemnity and moral damages of P30,000.00 each in addition to the original amount awarded, taking into account the physical suffering and mental anguish caused, as provided for under relevant jurisprudence and the Civil Code.

Doctrine:

Frustrated homicide requires the presence of intent to kill, which can be inferred from the use of a deadly weapon and the nature, location, and number of wounds. Case law dictates that reasonable doubt does not arise merely by the possibility of another person causing the injury. When timely medical assistance prevents death, the offense of frustrated homicide is consummated.

Class Notes:

- Frustrated Homicide under Article 250 of the Revised Penal Code requires intent to kill.
- Intent may be proved through means used, nature and number of wounds, and conduct of the offender.
- A lone but credible witness, especially the victim, is sufficient to convict.
- Correct imposition of penalties relies on the absence or presence of modifying circumstances.
- Civil liability includes compensatory damages (actual loss), moral damages (psychological impact), and civil indemnity (recognition of injury).

Historical Background:

The Supreme Court's decision in this case solidifies the principle that intent to kill is a critical element of frustrated homicide, regardless of the accused's denial of malice. The insistence on direct testimony, especially from the victim, and the determination of appropriate penalties reflect the judiciary's firm stance on the administration of criminal justice in the Philippines. This case reiterates the importance of concrete evidence, victim testimony, and proper qualification of criminal offenses and is part of the broader context of Philippine jurisprudence upholding the necessity of clear intent for the proper classification of violent crimes.