

Title: Salvador Yapyuco y Enriquez, et al. vs. Honorable Sandiganbayan and the People of the Philippines

Facts: In the evening of April 5, 1988, a shooting incident occurred in Barangay Quebiawan, San Fernando, Pampanga, taking the life of Leodevince Licup and injuring Noel Villanueva. The accused were Salvador Yapyuco, Jr., Generoso Cunanan, Jr., Ernesto Puno (all members of the Integrated National Police), Jose Pamintuan, Mario Reyes (barangay captains), and others affiliated with the Civil Home Defense Force or civilian volunteer officers. They were charged with murder, multiple attempted murder, and frustrated murder.

The accused initially entered not guilty pleas, with some applying for and granted bail. During the pre-trial conference, the remaining accused waived their right to pre-trial inquest. The joint trial commenced after evidence presented at the bail hearings was integrated into the trial proper.

The prosecution's narrative, collaborated by testimony and physical evidence, outlined the victims leaving a barrio fiesta and driving slowly along the dark road when they were suddenly fired upon without warning. The ensuing confusion included exchanges between the barangay captain and the injured, and the urgent relocation of the wounded to the hospital. The forensic chemist testified to gunpowder residue on the firearms of the accused and bullet holes predominantly on the passenger side of the victims' vehicle. The medico-legal expert detailed the injuries of the deceased and the surviving victim, supporting the prosecution's claim of intentional shooting.

The defense primarily relied on Yapyuco's testimony, suggesting a legitimate police operation that responded to reported NPA presence. Yapyuco claimed that shots were fired at the vehicle only after it aggressively tried to evade a checkpoint and subsequent warning shots.

The Sandiganbayan found the accused guilty on different charges, rejecting claims of lawful duty, citing the calculated positioning of the accused and the intensity of gunfire, indicative of an intent to kill without justification.

Issues:

1. Whether there was a conspiracy among the accused to commit the shooting.
2. Whether the accused acted in the lawful performance of their duties.
3. Whether the accused can be justified in their actions under the principle of mistake of fact.

4. Whether the prosecution has established guilt beyond a reasonable doubt for the crimes of homicide and attempted homicide.

Court's Decision:

1. Conspiracy was established given the accused's coordinated actions and the common goal to disable the vehicle.
2. The use of force was not justified as the aggressive response was not necessary for the fulfillment of duty.
3. Mistake of fact was not applicable as there was no honest and reasonable mistake; the accused's actions were not due to ignorance of fact but due to negligence and intent.
4. The prosecution successfully established guilt beyond reasonable doubt. Yapyuco and others were found to exhibit a clear intent to harm with their deliberate gunfire targeting the vehicle's passenger side. The accused were collectively responsible for the outcomes of their actions.

Doctrine: A "mistake of fact" constitutes a defense to a criminal charge only when such a mistake is honest, reasonable, and negates the intent which the penal statute requires to establish a specific crime. In criminal prosecutions, guilt must be established beyond reasonable doubt, relying on the strength of the prosecution's evidence, not the weakness of the defense.

Class Notes:

- Conspiracy requires a collective intention and action towards an unlawful goal.
- Justifying circumstances under Article 11 of the Revised Penal Code require the lawful fulfillment of duty without excess or negligence.
- A mistake of fact as a defense requires absence of negligence and a genuine misapprehension of factual circumstances.
- In a shooting incident resulting in death or harm, intent to kill is generally presumed unless accidental, while responsibility is aggregated among co-conspirators.

Historical Background:

The case reflects the volatile environment of barangay-level law enforcement in the Philippines during a period when rebel presence was of serious concern. The case illuminates the challenges facing law enforcement in distinguishing between legitimate policing and unlawful aggression, emphasizing the requisite for restraint and responsibility in the use of force. The incident and subsequent trial underscored the significance of clear rules of engagement and marked a cautionary tale regarding the duty and conduct of law

enforcers within Philippine society.