

**\*\*Title:\*\*** People of the Philippines v. Federico Abrazaldo

**\*\*Facts:\*\***

On July 15, 1995, in Barangay Pogo, Mangaldan, Pangasinan, Federico Abrazaldo, while intoxicated, initially attempted to attack his uncle, which prompted a response from barangay authorities including Delfin Guban. A confrontation between Abrazaldo and Guban ensued, during which Abrazaldo fatally stabbed Guban. The case progressed to the Regional Trial Court, Branch 44, Dagupan City, where various witnesses testified against Abrazaldo, while he and his sister provided contrasting defenses. Abrazaldo claimed self-defense, stating Guban attacked him first. The trial court found Abrazaldo guilty of murder, considering the presence of treachery and aggravating circumstances, and sentenced him to death. This decision led to an automatic review by the Supreme Court.

**\*\*Issues:\*\***

1. Whether the claim of self-defense by Abrazaldo was credible.
2. The veracity of the recovery of the weapon and its linkage to Abrazaldo.
3. The acceptance of testimony by Abrazaldo's sister which contradicted his claim.
4. The determination of treachery in the stabbing of Guban.
5. The consideration of nighttime as an aggravating circumstance.
6. Whether it's aggravated that the victim was performing official duties.

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

The Supreme Court modified the lower court's decision. The claim of self-defense by Abrazaldo was rejected due to inconsistencies and lack of credible evidence. The Court found the testimony against Abrazaldo credible and his actions uncorroborated by reliable testimony. It was determined that there was no treachery as the confrontation did not guarantee the act was unexpected or that Guban couldn't defend himself. The nighttime setting and the claim that Guban was performing official duties were not considered aggravating circumstances. Thus, Abrazaldo was found guilty of homicide, not murder, and received a modified sentence.

**\*\*Doctrine:\*\***

This case reiterates the doctrine that treachery must be clearly proven and cannot be assumed, as well as the principle regarding the credibility of self-defense claims. It highlights the criteria needed to substantiate claims of self-defense, and the standard required to consider circumstances as aggravating.

**\*\*Class Notes:\*\***

1. **\*\*Self-defense:\*\*** The accused must prove he was not the unlawful aggressor, there was lack of sufficient provocation, and the means used to repel the aggression were reasonable.
2. **\*\*Treachery (Alevosia):\*\*** Ensures the execution of the crime without risk to the assailant arising from any defense the victim might make. Must be proven as clearly as the killing.
3. **\*\*Aggravating Circumstances:\*\*** These must be specified in the charge and proven during the trial to be considered in sentencing.
4. **\*\*Credibility of Witnesses:\*\*** The trial court's assessment of credibility is given high respect unless facts or circumstances of influence have been overlooked.
5. **\*\*Homicide vs. Murder:\*\*** Distinguished primarily by the presence of qualifying circumstances such as treachery.

**\*\*Historical Background:\*\***

This case reflects the Philippine legal principles concerning the evaluation of self-defense, the differentiation between murder and homicide based on the manner of execution, and the usage of aggravating circumstances in criminal liability. It demonstrates the judiciary's rigorous scrutiny applied in capital cases to ensure the fair and just application of the law.