

****Title:**** People of the Philippines vs. Rodrigo Macaspac y Isip

****Facts:**** Rodrigo Macaspac y Isip was convicted of murder by the Regional Trial Court (RTC) of Caloocan City and affirmed with modification by the Court of Appeals (CA) for the fatal stabbing of Robert Jebulan Pelaez in July 1988. The case remained dormant for over 15 years due to Macaspac's evasion until his arrest in July 2004. Upon arraignment, Macaspac pleaded not guilty. He initially claimed self-defense, later altering his statement to assert the stabbing was accidental. The prosecution's evidence illustrated a heated argument escalating to the fatal stabbing. The RTC ruled the act was qualified by treachery, sentencing Macaspac to reclusion perpetua and mandating indemnities. The CA affirmed the conviction but adjusted civil liabilities. Macaspac appealed to the Supreme Court (SC), arguing the prosecution failed to prove murder beyond reasonable doubt.

****Issues:****

1. Whether treachery was correctly appreciated as an attendant circumstance.
2. Whether evident premeditation was established.
3. The appropriate classification of the crime committed and the corresponding penalty.
4. The determination of civil liabilities.

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

1. ****On Treachery:**** The SC diverged from the lower courts, determining no treachery as Macaspac's previous threat and the heated argument provided warning to Jebulan, negating suddenness or surprise.
2. ****On Evident Premeditation:**** The SC concluded evident premeditation was not established due to the quick progression from determination to execution, negating sufficient period for reflection.
3. ****Classification of the Crime and Penalty:**** Absent treachery and evident premeditation, Macaspac's act was reclassified to homicide, not murder. Thus, he was sentenced to an indeterminate penalty of eight years of prision mayor, as a minimum, to 14 years, eight months, and one day of reclusion temporal, as the maximum.
4. ****On Civil Liabilities:**** Modifications were made to align with prevailing jurisprudence, including awards for civil indemnity, moral damages, and temperate damages, with interest on all damages awarded at a rate of 6% per annum from finality until full payment.

****Doctrine:**** The SC reiterated the defining elements of treachery and evident

premeditation, emphasizing the necessity of a clear demonstration of each element. Specifically, it was highlighted that treachery requires a mode of execution that gives the targeted individual no opportunity for defense or retaliation, deliberately chosen by the assailant, and that evident premeditation necessitates a period of “cool thought and reflection.”

****Class Notes:****

- ****Treachery (Alevosia):**** Requires (1) the employment of means of execution that gives the person attacked no opportunity to defend himself or retaliate, and (2) the deliberate or conscious adoption of such means by the assailant.
- ****Evident Premeditation:**** Consists of (1) the time when the offender decided to commit the crime, (2) an act clearly indicating that the offender clung to his determination, and (3) sufficient lapse between determination and execution, allowing time for reflection.
- ****Homicide vs. Murder:**** The absence of qualifying circumstances such as treachery or evident premeditation reduces a killing from murder to homicide.
- ****Civil Liabilities in Homicide Cases:**** Include civil indemnity, moral damages, and temperate damages, with the imposition of interest from the decision’s finality until full payment.

****Historical Background:**** The protracted nature of this case, spanning over 15 years due to the evasion of the accused, underscores challenges in ensuring timely justice. This decision further exemplifies the high bar set for establishing qualifying circumstances that elevate homicide to murder under Philippine law, as well as the nuanced approach of the judiciary in reassessing lower court decisions.