

Title: Edgar Esqueda vs. People of the Philippines

Facts:

The case revolves around Edgar Esqueda, co-accused with John Doe, for two separate instances of frustrated murder occurring on March 3, 1999, in Sta. Catalina, Negros Oriental, Philippines. The victims were Venancia Aliser and Gaudencio Quiniquito, live-in partners, who were attacked in their home. The assailants allegedly identified themselves as members of a roving patrol seeking a drink, leading to the victims being stabbed multiple times. Despite serious injuries, both victims survived due to timely medical intervention. Esqueda, upon capture, pleaded not guilty, while John Doe remained at large.

The Regional Trial Court (RTC) of Dumaguete City conducted a joint trial due to common evidence across both cases. The prosecution established the attack via testimonies from the victims and attending physician Dr. Fidencio G. Aurelia, emphasizing the serious wounds inflicted. The defense, through witness testimonies, claimed Esqueda was elsewhere, fishing during the time of the attack.

On December 12, 2001, the RTC acquitted Esqueda of one charge but found him guilty of frustrated homicide in relation to Venancia Aliser due to insufficient evidence of conspiracy in Quiniquito's stabbing. Esqueda appealed, but the Court of Appeals affirmed the RTC's decision. Esqueda then filed a petition for review on certiorari to the Supreme Court, primarily contesting his conviction based on claims of alibi and denial.

Issues:

1. The validity of Esqueda's defense of alibi and denial against positive identification by the victims.
2. Determining if fear of reprisal justified the victims' delay in identifying the perpetrators.
3. Reevaluation of the crime's classification from frustrated homicide to frustrated murder due to alleged presence of treachery.

Court's Decision:

The Supreme Court rejected Esqueda's defenses, emphasizing the credibility and positive identification of the accused by the victims. The Court found no merit in the argument that fear and delay in witness identification affected the credibility of testimonies. Moreover, the Court recalibrated the conviction from frustrated homicide to frustrated murder, considering treachery as a qualifying attribute of the attack—which was sudden, unprovoked, and ensured the defenselessness of the victims.

The Court ruled that Esqueda performed all acts necessary to consummate murder, only failing due to external factors beyond his control (i.e., medical intervention). Accordingly, Esqueda was sentenced to an indeterminate penalty and ordered to pay damages and attorney's fees to the victim, Venancia Aliser.

Doctrine:

The positive identification of an accused by credible witnesses prevails over alibi and denial, particularly when alibi fails to incontrovertibly prove the physical impossibility of presence at the crime scene. Moreover, an appeal in a criminal case opens the entire case for review, allowing the reclassification of the crime based on evidence, even if not raised by parties. Treachery can qualify an attack as murder when it ensures execution without risk to the assailant.

Class Notes:

1. Key Elements of Frustrated Murder: The offender performs all acts of execution which would produce the felony as a consequence but which, nevertheless, do not produce it due to causes independent of the will of the perpetrator.
2. Doctrine of Positive Identification vs. Alibi: Positive identification of an accused, when credible and certain, far outweighs the defense of alibi and denial.
3. Treachery (Alevosia): Present if the offender employs means, methods, or forms in the execution that tend directly and especially to insure its execution, without risk to himself arising from any defensive or retaliatory act which the victim might make.

Historical Background:

This case provides insight into the judicial process of appeals in criminal cases in the Philippines, illustrating how a higher court can amend the lower court's decision based not only on procedural merits but also on the reevaluation of facts and classification of crimes, underpinning the principle of complete justice afforded to all parties.