

****Title:**** *People of the Philippines vs. Roy San Gaspar*

****Facts:****

On April 25, 1999, in Barangay Bambad, Isulan, Sultan Kudarat, Roy San Gaspar was alleged to have intentionally shot his wife, Imelda E. San Gaspar, with a gauge homemade shotgun at around 11:30 p.m., inflicting a fatal gunshot wound that led to her demise. Charged with the crime of Parricide under Article 246 of the RPC, he pleaded not guilty on July 12, 2000. The case saw testimonials from the victim's children and stepchildren, a relative who covered funeral expenses, an investigating police officer, and the municipal health officer who performed the autopsy, all supporting the prosecution's claim. Conversely, the defense's narrative, supported by the appellant, his mother, and another witness, portrayed the shooting as accidental, caused by the door hitting the shotgun as the appellant entered the room. The Regional Trial Court (RTC) found Gaspar guilty, a decision affirmed by the Court of Appeals (CA) with modifications on damages awarded.

****Issues:****

1. Whether the prosecution was able to establish the elements of parricide beyond a reasonable doubt.
2. Whether appellant's defense of accidental shooting was credible.

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

The Supreme Court dismissed the appeal, affirming the CA's decision with modifications. The Court found that the elements of parricide were indeed established, citing eyewitness accounts from the victim's children who testified against the appellant. The assertion by Gaspar of the shooting being an accident was not deemed credible, especially in light of autopsy findings indicating a close-range shot. Hence, Gaspar's guilt was affirmed, emphasizing the weight of positive identification and eyewitness accounts over his denial and uncorroborated accident defense.

****Doctrine:****

The case reiterates the principle that factual findings of the trial court, especially concerning the credibility of witnesses, are accorded high respect and generally not disturbed by the Supreme Court unless there is a clear misapprehension of facts or grave abuse of discretion. It also underscores that denial is a weak defense against positive identification by credible witnesses. Moreover, it illustrates the application of Article 246 of the RPC on parricide, highlighting the elements necessary for its establishment.

****Class Notes:****

1. ****Elements of Parricide (Article 246, RPC):**** A person is guilty of parricide if they kill (1) their father, mother, or child, whether legitimate or illegitimate, or (2) a legitimate other ascendant or descendant, or (3) their legitimate spouse.
2. ****Positive Identification vs. Denial:**** Positive identification of an accused by a credible witness generally prevails over the defendant's denial.
3. ****Credibility of Eyewitness Testimony:**** Eyewitness accounts, especially from victims' immediate relations without proven ill motives, are highly credible.
4. ****Doctrine on Factual Findings:**** The Supreme Court defers to the factual findings of lower courts regarding witness credibility unless there is a misapprehension of facts or grave use of discretion.

****Historical Background:****

The decision illuminates the Philippine judiciary's approach toward resolving disputes involving domestic violence, showcasing the legal system's handling of parricide cases. It also reflects on the broader societal issue of domestic violence, underscoring the crucial role of reliable witness testimonies and forensic evidence in ascertaining the truth in criminal proceedings.