

Title: People of the Philippines vs. Oscar Mat-An y Escad

Facts:

On April 8, 2009, Oscar Mat-An y Escad was charged with the crimes of **Attempted Homicide** and **Murder** for unjustly assaulting Anthonette Ewangan, a 1 1/2-year-old child, and Minda Babsa-ay, a 61-year-old woman. The accused was tried in the Regional Trial Court (RTC) of Baguio City, Branch 59, after consolidating the two cases upon his motion. Oscar pleaded not guilty during his arraignment. The trial proceeded with both parties presenting their evidence.

The prosecution built its case around ten witnesses who disclosed a scenario where Oscar, after an argument with Minda Babsa-ay over not receiving money remittances from his overseas worker wife through Minda, attacked Minda and inadvertently injured Anthonette in the process. The defense relied solely on Oscar's testimony, invoking denial and failing recollection after blacking out from intoxication.

Initially, the RTC found Oscar guilty of attempted homicide and murder, respectively, appreciating evident premeditation and abuse of superior strength as aggravating factors. The Court of Appeals (CA), upon appeal, affirmed with modifications. It rejected the presence of evident premeditation but upheld murder for the crime against Minda due to abuse of superior strength. Additionally, it convicted Oscar only of slight physical injuries for Anthonette due to lack of evidence of intent to kill.

Issues:

1. Whether the factual findings and credibility assessments by the trial court were accurate.
2. The applicability of abuse of superior strength in qualifying Oscar's crime against Minda as murder.
3. The appropriate crime classification and liability for the injury inflicted upon Anthonette.
4. The consideration of intoxication as a mitigating factor.

Court's Decision:

The Supreme Court dismissed the appeal for lack of merit. It upheld the CA's decision with modifications regarding damages awarded. It reiterated the principle that trial courts' credibility assessments, due to their firsthand opportunity to observe witnesses, carry significant weight unless substantial contradictions in evidence are proven. Thus, the Court

affirmed that minor inconsistencies among witnesses do not tarnish their overall credibility.

For Minda's murder, the Court validated the CA's classification, underscoring the disparity in strength and the advantage Oscar abusively exerted in attacking an unarmed, physically inferior woman as indicative of abuse of superior strength.

With regard to Anthonette's injury, the Court confirmed slight physical injuries as the appropriate conviction due to the absence of intent to kill evidence.

Lastly, the Court rejected the intoxication plea as a mitigating factor due to Oscar's lack of substantive proof illustrating significant intoxication levels that could compromise his mental faculties.

Doctrine:

In criminal law, **abuse of superior strength** is a qualifying circumstance that elevates killings to murder when the assailant utilizes overwhelming force against a defenseless victim, exploiting physical disparity. Moreover, **factual findings** by lower courts, especially regarding witness credibility, are generally conclusive unless glaring errors or misinterpretations are presented. Lastly, **intoxication** can be considered a mitigating factor only when unequivocally proven it significantly impaired the accused's mental faculties during the crime commission.

Class Notes:

- **Credibility of Witnesses**: The Supreme Court gives great deference to the trial courts' assessment of witness credibility due to their unique position to observe witnesses directly.
- **Abuse of Superior Strength**: This qualifying circumstance in murder cases requires a clear disparity in physical strength, which the perpetrator exploited to commit the crime.
- **Intoxication as a Mitigating Factor**: For intoxication to mitigate criminal liability, it must be demonstrated that it was neither habitual nor subsequent to the plan to commit the felony and significantly impaired the accused's mental faculties.

Historical Background:

This case highlights the Philippine judicial system's handling of domestic violence and murder, emphasizing the investigative and judicial scrutiny applied in proving the guilt beyond a reasonable doubt and ensuring that the aggravating or mitigating circumstances are accurately appreciated in sentencing.