

Title:

Turalba vs. People of the Philippines: A Case of Carnapping and the Defense of Insanity

Facts:

In Olongapo City, Philippines, on November 20, 2007, Oligario Turalba y Villegas was involved in a criminal incident involving the unauthorized taking of a 1996 model CRV Honda Wagon, owned by Gregorio Calimag. The vehicle was parked with the key left inside by the owner, who was then purchasing bread from a nearby bakery. Turalba drove away the vehicle, which led Calimag to pursue him, eventually flagging down authorities who apprehended Turalba.

During the prosecution, the defense presented a mental health evaluation conducted by Dr. Ma. Lourdes Labarcon Evangelista, attesting to Turalba's psychotic condition, presumably affecting his consciousness during the crime. However, the Regional Trial Court (RTC) of Olongapo City ruled against Turalba, finding him guilty of carnapping as defined under Republic Act (RA) No. 6539. The Court of Appeals (CA) later affirmed this decision, rejecting Turalba's insanity defense and mitigating circumstance argument derived from it.

Issues:

1. Whether Turalba's alleged psychosis exempts him from criminal liability for carnapping under the insanity defense.
2. Whether psychosis, if proven, could be considered a mitigating circumstance in the imposition of Turalba's penalty.

Court's Decision:

The Supreme Court denied the petition and affirmed the decisions of the RTC and CA, concluding that Turalba failed to prove his insanity defense with clear and convincing evidence. Specifically, it was highlighted that there was a lack of substantial proof showing Turalba's psychotic condition immediately before or during the commission of the crime. Moreover, the Court ruled that the insanity defense and the mitigating circumstance of diminished will-power due to illness could not be applied, as Turalba was charged under a special law (RA No. 6539) that does not adhere to the penal provisions of the Revised Penal Code (RPC) related to mitigating circumstances.

Doctrine:

1. Insanity as an exempting circumstance under the RPC requires a complete deprivation of intelligence in committing the criminal act.

2. In the prosecution of crimes under special laws, the rules for the application of penalties and mitigating circumstances under the RPC do not apply, consistent with the ruling in *People v. Simon*.

Class Notes:

- **Insanity Defense**: To successfully employ the insanity defense, the accused must demonstrate, through clear and convincing evidence, a complete deprivation of intelligence at the time of committing the crime.
- **Mitigating Circumstance of Mental Illness**: Under the RPC, mental illness can reduce criminal liability if it diminishes the will-power without depriving the offender of the consciousness of his acts. This, however, is not applicable to crimes punished under special laws.
- **Applicability of RPC to Special Laws**: Special laws, such as RA No. 6539, which penalizes carjacking, do not permit the application of RPC provisions on penalties and mitigating circumstances. This emphasizes the separateness of the penal systems under the RPC and special laws.

Historical Background:

This case underscores the highly specific and stringent requirements for asserting the insanity defense in Philippine criminal jurisprudence. It also delineates the boundaries between penalties and mitigating circumstances under the Revised Penal Code as opposed to those under special laws, highlighting a pivotal aspect of Philippine criminal law where the nature of the law governing the offense crucially affects the applicable penalties and defenses.