

Title: Artemio Yadao vs. People of the Philippines

Facts:

Artemio Yadao was charged with homicide for allegedly causing the death of Deogracias Gundran on October 1, 1988, in Bauang, La Union, Philippines. Yadao's arraignment led to a "Not Guilty" plea, initiating a trial with both parties presenting evidence and witnesses. The prosecution aimed to prove Yadao's culpability through four witnesses, while the defense countered with five witnesses and documentary evidence, including an autopsy report by Dr. Magdalena Alambra.

The incident occurred during Yadao's birthday celebration, where Gundran, despite not being invited, attended and drank gin. A dispute arose when Gundran attacked Yadao, leading to a physical altercation where Gundran was hit and subsequently fell, hitting his head on a table edge. Following the incident, Gundran proceeded to Carmelita Limon's house, complaining of pain in his stomach/chest area. He died two days later, on October 3, 1988. An autopsy performed by Dr. Alambra attributed his death to cardio-respiratory arrest due to pulmonary tuberculosis. However, disbelieving this cause of death, Gundran's father requested a second autopsy by Dr. Arturo Llavore of the NBI, which attributed death to severe cerebral edema from traumatic head injuries.

Procedural Posture:

The case, initially filed at the Regional Trial Court (RTC) of Bauang, La Union, concluded with Yadao's conviction. Yadao appealed to the Court of Appeals, which affirmed the RTC's decision. Yadao then sought review from the Supreme Court under Rule 45 of the Revised Rules of Court.

Issues:

1. Whether the prosecution sufficiently proved Yadao's guilty beyond reasonable doubt of homicide.
2. The accuracy and relevance of conflicting autopsy reports in establishing the cause of death.

Court's Decision:

The Supreme Court reversed the decisions of both the RTC and the Court of Appeals, resulting in Yadao's acquittal based on reasonable doubt. The Court highlighted discrepancies and insufficient evidence to conclusively link Yadao's actions to Gundran's death. It pointed out that the prosecution failed to prove the causation element beyond a

reasonable doubt, particularly questioning the link between the inflicted injury and the ensuing death supposedly due to cerebral edema. The Court, however, recognized the possibility of civil liability on Yadao's part, awarding civil damages to the victim's heirs despite the acquittal.

Doctrine:

The case reiterated the doctrine of reasonable doubt, emphasizing that the prosecution's failure to prove guilt beyond reasonable doubt warrants acquittal. Additionally, it showcased the principle that a person may be acquitted on reasonable doubt but still be held liable for civil damages if the acquittal is not based on the declaration that the facts from which the civil claims could arise did not exist.

Class Notes:

- ****Elements of Homicide****: (1) A person was killed, (2) The accused killed him without any justifying circumstance, (3) The accused had the intention to kill, presumed, and (4) The killing was not attended by any qualifying circumstances of murder or by that of parricide or infanticide.
- ****Proof Beyond Reasonable Doubt****: Requires moral certainty or the degree of proof which produces conviction in an unprejudiced mind.
- ****Doctrine of Reasonable Doubt****: An accused must be acquitted if the evidence does not prove guilt beyond reasonable doubt.
- ****Civil Liability Amidst Acquittal****: The Court may acquit an accused due to reasonable doubt but still order the payment of civil damages.

Historical Background:

This case illustrates the Philippine judicial process, particularly highlighting the appeal mechanisms and the Supreme Court's power to review and reverse lower court decisions. It underscores the crucial role of forensic evidence in criminal proceedings and the Court's commitment to ensuring that guilt must be proven beyond a reasonable doubt to uphold justice and the rights of the accused under the Constitution.