

****Title:****

The United States vs. Victoria Vedra, 12 Phil. 96 (1909)

****Facts:****

- In the early morning of November 16, 1907, Victoria Vedra, an unmarried woman, gave birth to a living child.
- Vedra's nephew, residing in the same house, was awakened by the cries of the newborn and attempted to light a lamp in the dark room.
- Vedra, noticing her nephew's actions, quickly left the house with the infant, stating she was going to the toilet when questioned by her nephew.
- An hour later, Vedra returned without the infant.
- The nephew reported the incident to the barrio lieutenant, who initiated an investigation at daybreak.
- Initially, Vedra denied having given birth but eventually confessed. She admitted to burying the child and guided authorities to the burial site.
- The municipal health inspector and provincial physician examined the body, confirming it was a fully developed, healthy newborn with abrasions on both sides of the nose likely caused by external pressure, suggesting suffocation.

****Procedural Posture:****

- Victoria Vedra was charged with the crime of infanticide.
- Following the prosecution's case, the trial court found her guilty, leading to her appeal to the Supreme Court of the Philippines.

****Issues:****

1. Whether the evidence presented was sufficient to prove that Victoria Vedra caused the death of her newborn child.
2. Whether the abrasions found on the child's nose supported the conclusion that the child was suffocated, leading to its death.
3. Whether the actions of the accused right after giving birth demonstrated intent to commit infanticide.

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

- ****Issue 1:**** The Court held that the circumstances, the behavior of the accused, and the immediate sequence of events provided sufficient evidence to attribute the death of the newborn to Vedra. The Court stated that given the child was born alive and in good health, it couldn't be presumed to have died of natural causes within a short time without a

justifiable reason.

- **Issue 2:** On the abrasions found on the child's nose, the Court determined that such signs of violence evidenced suffocation, which was consistent with the actions of the accused to conceal her dishonor by killing the newborn.

- **Issue 3:** The Court found that Vedra's actions—leaving the house hastily with the child, returning without it, and the subsequent denial followed by a confession—clearly established her intent to commit infanticide to conceal her dishonor.

The Court affirmed the lower court's judgment, sentencing Vedra to two years, four months, and one day of *prision correccional*, with additional accessory penalties and costs. Vedra was credited with half the period of preventive imprisonment served.

Doctrine:

This case reaffirms the doctrine that actions immediately subsequent to the crime, combined with physical evidence, can be sufficient to ascertain intent and guilt. The case elucidates the concept of infanticide and highlights circumstantial evidence and conduct right after childbirth as proof of criminal intent.

Class Notes:

- Elements of Infanticide (Philippine law):

1. **Offender:** A parent, or related ascendants.
2. **Victim:** A newly born child.
3. **Intent:** To kill the child to conceal dishonor.

- Key principles:

The proximity between birth and child's death, coupled with an immediate sequence of suspicious behaviors, supports the determination of guilt.

- Pertinent Statute:

Article 255 of the Revised Penal Code of the Philippines: Infanticide.

- **Application:**

This case is a vivid illustration of how the Courts may deduce the mental state of the accused and criminal responsibility based on immediate actions and situational evidence.

Historical Background:

During the early 1900s, societal expectations for women, particularly in the Philippines,

placed immense stigma on unwed mothers. The crime of infanticide frequently stemmed from attempts to avoid such dishonor. This case highlights the sociocultural pressures influencing the actions leading to infanticide and how legal interpretations adapted to address these specific societal context crimes.