

Title: *People of the Philippines vs. Manolito Oyanib y Mendoza*

****Facts:****

Accused Manolito Oyanib y Mendoza (Manolito) was charged with homicide and parricide. On the evening of September 4, 1995, Manolito went to the rented place of his estranged wife, Tita Oyanib, in Iligan City to ask her to attend a school meeting. Upon arrival, he heard sounds of intimacy from inside and pried open the door using a hunting knife. Manolito found Tita and her paramour, Jesus Esquierdo, in the act of sexual intercourse. Manolito stabbed Jesus multiple times after being kicked by him. Tita tried to intervene and attacked Manolito with a Tanduay bottle, causing a scuffle during which Manolito stabbed her multiple times as well. Both victims died from the stab wounds.

Manolito voluntarily surrendered to the police the following day and admitted the killings, claiming he acted under the exceptional circumstances provided in Article 247 of the Revised Penal Code.

****Procedural Posture:****

1. ****1995:**** Two informations were filed by the Iligan City Prosecutor charging Manolito with murder (later found to be homicide) and parricide.
2. ****1996:**** Manolito was arraigned, pled not guilty, and the cases were jointly tried.
3. ****1997:**** The RTC found Manolito guilty of homicide and parricide, sentencing him to 6 months to 8 years for homicide and reclusion perpetua for parricide.
4. Manolito appealed to the Supreme Court, arguing he was entitled to the exceptional circumstances under Article 247 of the Revised Penal Code.

****Issues:****

1. Whether Manolito's acts fall under the exceptional circumstances described in Article 247 of the Revised Penal Code, absolving him of the crimes charged.
2. Whether the photograph evidence showing Jesus' unzipped and unbuttoned pants lends credibility to Manolito's defense.
3. Whether the trial court erred in appreciating the facts and evidence, concluding beyond reasonable doubt that Manolito committed homicide and parricide.

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

The Supreme Court found merit in the appeal, reversing the RTC's decision. The Court ruled that Manolito acted within the exceptional circumstances outlined in Article 247, namely that he caught his spouse in the act of sexual intercourse and killed them in the act or

immediately thereafter. This justified the lesser penalty of *destierro* (exile) rather than imprisonment:

1. **Exceptional Circumstances (Article 247 RPC):**

- **Element 1:** Manolito found his wife and Jesus in the act of sexual intercourse.
- **Element 2:** He killed them immediately upon discovery, driven by jealousy and outrage.
- **Element 3:** No evidence suggested that Manolito facilitated or promoted his wife's adultery.

2. **Photograph Evidence:**

- The photograph of Jesus with unbuttoned and unzipped pants supports Manolito's testimony and defense.

3. **Erroneous Appreciation of Facts:**

- The trial court did not adequately consider the emotional and psychological factors contributing to Manolito's actions under distress.

Doctrine:

The case reiterates Article 247 of the Revised Penal Code:

- A legally married person who surprises his or her spouse in the act of committing sexual intercourse with another person and kills any or both in the act or immediately thereafter incurs no criminal liability and shall be punished with *destierro*.

Class Notes:

- **Homicide and Parricide:** Definitions under the Revised Penal Code.
- **Article 247, RPC:** Exceptional circumstances absolving criminal liability where a spouse surprises their partner in sexual intercourse with another and kills them.
- **Self-defense and Absolutory Causes:** Situations where the act committed is a crime, but no penalty is imposed for reasons of public policy and sentiment.

Key Provisions:

- **Article 247, RPC:** Imposes *destierro* rather than criminal penalties under specified circumstances.
- **Article 70, RPC:** Legal limitations on imprisonment duration.

Historical Background:

In the context of Philippine jurisprudence, Article 247 reflects societal values concerning

honor and marriage. This provision provides for a lesser penalty in instances where a spouse, driven by passion and a profound sense of betrayal, kills their partner caught *in flagrante delicto*. Such cases often highlight the judiciary's recognition of human frailty and the profound impact of emotional distress on individual actions. The ruling illustrates the complex interplay between legal principles, human behavior, and cultural norms concerning marital fidelity and honor.