

Title: People of the Philippine Islands v. Gregorio Reyes, 61 Phil. 341 (1935)

Facts:

1. **April 30, 1934**: On the evening of this date, Fausta Tavera was fatally injured by Gregorio Reyes. Tavera had recently been living with Reyes, but her parents persuaded her to return home, demanding a dowry of PHP 30 before setting a marriage date.
2. **Barrio Event**: A barrio procession occurred, followed by an impromptu dance at a local house. During this event, Tavera informed Reyes that she could not return to him and would go to Catanduanes with her parents.
3. **Incident**: Reyes, frustrated by Tavera's decision, dragged her toward the street and stabbed her in the chest with a fan knife. Tavera ran to the house of the barrio lieutenant and collapsed dead at the foot of the staircase.
4. **Pursuit and Escape**: Relatives of Tavera attempted to seize Reyes, but he escaped using his knife.
5. **Autopsy Findings**: The superficial wound on Tavera did not penetrate her thoracic cavity but hit a bone. Despite the wound's initial appearance, the sanitary inspector confirmed that she died from shock due to the injury.

Procedural Posture:

1. **Trial Court (Court of First Instance of Camarines Sur)**: Reyes was convicted of homicide.
2. **Defense**: Reyes maintained that he was attacked by Tavera's relatives and that the injury to Tavera was accidental.
3. **Prosecution**: Witness testimony contradicted Reyes' account, and the trial court found his story insincere.
4. **Appeal**: Reyes appealed his conviction to the Supreme Court of the Philippines, arguing the inadequacy of evidence for homicide since the wound was superficial and disputing the trial court's rejection of his self-defense claim.

Issues:

1. **Causation**: Can Reyes be held liable for homicide if the fatal wound was superficially minor and shock, rather than the wound's depth, caused death?
2. **Intent**: Does Reyes' claim that the injury was accidental, amidst an alleged attack by Tavera's relatives, absolve him of liability for homicide?
3. **Mitigating Circumstances**: Did the trial court correctly consider or reject mitigating

circumstances, such as lack of intention to commit homicide and provocation by Tavera?

Court's Decision:

****Causation****:

- The Supreme Court affirmed that Reyes could be held liable for homicide despite the wound's minor depth. The court underlined that an individual is responsible for the consequences of his criminal acts. Even if Tavera had an underlying health issue, Reyes' assault was the proximate cause of her death.

****Intent****:

- The court rejected Reyes' account of accidental injury during an affray. Witness testimonies clearly indicated deliberate stabbing. When a person uses a lethal weapon against vital body parts, death can be reasonably anticipated, and intent is implied.

****Mitigating Circumstances****:

- The trial court considered and then dismissed Reyes' lack of intent to commit a grave wrong, acknowledging that Reyes used a weapon in a manner where death was foreseeable.
- The claimed provocation based on Tavera rejecting an illicit relationship was correctly disregarded. According to the law, provocation must come from the offended party, which was not the case here.

Doctrine:

- ****Causation and Responsibility****: A person is responsible for the consequences of his criminal actions, even if the immediate cause of death (e.g., shock or an underlying condition) results from an initial superficial wound (U. S. vs. Luciano, 2 Phil., 96).
- ****Intent****: When lethal force is used against vital body parts, intent to cause harm or death is implied (U. S. vs. Lugo and Lugo, 8 Phil., 80; U. S. vs. Brobst, 14 Phil., 310).

Class Notes:

- ****Elements of Homicide****: (a) The accused caused injury; (b) Victim died from that injury; (c) Intentional infliction.
- ****Causation****: Even superficial wounds causing death via shock imply full responsibility.
- ****Intent****: Usage of a lethal weapon against vital parts of the body presupposes intent.
- ****Mitigating Circumstances****: Provocation must emanate from the victim; unrelated provocations are invalid.

****Relevant Statutes**:**

- ****Article 249, Revised Penal Code****: Defines Homicide and its qualifying circumstances.
- ****Act No. 4103****: Indeterminate Sentence Law, pertinent to sentencing ranges.

Historical Background:

This case highlights the Philippine legal principles during the American colonial period, emphasizing the penal system's approach to intent and causation in violent crimes. It illustrated the judicial inclination to derive intent from the nature and site of inflicted injuries, underlining colonial influence on criminal jurisprudence still relevant in contemporary legal systems.