

Title: The United States vs. Anastasio Maisa

Facts:

Anastasio Maisa and Jose Machón were involved in a physical altercation. During the fight, Isaac Monrayo attempted to separate the two by pushing Maisa, which caused Maisa to fall to the ground. As Maisa got up, he struck Monrayo in the face, resulting in Monrayo's right eye becoming completely disabled. Maisa contended that his blow was intended for Machón, not Monrayo.

Procedural Posture:

The lower court found Maisa guilty and sentenced him to two years, four months, and one day of prisión correccional. Maisa was also ordered to pay Isaac Monrayo an indemnity of 50 pesos, with the stipulation of subsidiary imprisonment in case of insolvency. Additionally, Maisa was to pay the costs of both instances—the trial and the appeal. Maisa then appealed to the Philippine Supreme Court.

Issues:

1. **Intent and Mistaken Identity:** Whether Maisa can be excused from criminal liability given his claim that the blow was intended for Machón and not Monrayo.

Court's Decision:

The Philippine Supreme Court affirmed the lower court's ruling. The Court held that even though the wrongful act was committed against Monrayo instead of the intended target Machón, this does not absolve Maisa of criminal liability.

- **Issue 1:** The court cited paragraph 3 of article 1 of the Penal Code, emphasizing that committing a wrongful act or misdemeanor, even against a person other than the one whom it was intended to injure, does not excuse the offender from criminal responsibility. The court found that Maisa's action of striking Monrayo in the face, regardless of his intention toward Machón, was a voluntary commission of a wrongful act. Hence, Maisa is criminally liable for the injury caused to Monrayo.

Doctrine:

Mistake of Fact in Criminal Liability: The case established that a wrongful act committed against an unintended victim still incurs criminal liability. According to paragraph 3 of article 1 of the Penal Code, an offender cannot be excused from criminal liability on the basis that the wrongful act was aimed at someone else.

Class Notes:

- **Elements of Criminal Liability:**
- **Actus Reus (Commission of a wrongful act):** Maisa struck Monrayo in the face, causing serious injury.
- **Mens Rea (Intent):** Maisa's intent was to strike Machón, but the law holds him accountable for the consequences of his actions even if they affect an unintended victim.
- **Legal Principle:** Mistaken identity or error in the intended target does not absolve criminal liability if the act is voluntary.

Relevant Legal Statutes:

- **Penal Code Article 1, Paragraph 3:** "Although the wrongful act be committed against a person other than the one whom it was intended to injure, this fact does not excuse the offender from criminal liability for the voluntary commission of a wrongful act or misdemeanor."

Explanation:

This statute implies that criminal liability is based on the act committed, regardless of whether the harm was inflicted on the intended person or another party.

Historical Background:

The case occurs during the early 20th century in the Philippines under American sovereignty when the colonial legal system started to blend both Spanish legal traditions and American influences. The decision underscores the strict adherence to the Penal Code inherited from Spanish law, which emphasized accountability for wrongful acts irrespective of the intended victim. This context reflects the judicial evolution within the colonial administration, focusing on maintaining legal order and personal responsibility.