

Title: People of the Philippines v. Salve Gonzales y Torno

Facts:

Salve Gonzales y Torno was charged with parricide for killing her 13-year-old son Ronald Gonzales. On September 16, 2009, Salve arrived home to find that Ronald had sold the bronze wire connected to their electric meter. Enraged, she first hit Ronald with a hanger until it broke and then used the wooden handle of a broom to continue beating him, resulting in his death. Ronald's siblings, Rhey and Racel, witnessed the incident. Initially pleading not guilty, Salve was convicted by the Regional Trial Court (RTC) and the conviction was affirmed by the Court of Appeals (CA).

Issues:

1. **Whether the elements of parricide were sufficiently proven.**
2. **Whether Salve's claim that Ronald's injuries were accidental holds any merit.**
3. **Whether the mitigating circumstance of lack of intention to commit so grave a wrong should be appreciated in Salve's favor.**
4. **Whether the awarded damages by the lower court were appropriate.**

Court's Decision:

1. **Proof of Parricide:**

- The Supreme Court held that the three elements of parricide under Article 246 of the Revised Penal Code were present: (1) a person (Ronald Gonzales) was killed, (2) Salve Gonzales y Torno was proven to be the killer, and (3) the deceased was a child of the accused.

- The prosecution presented eyewitness testimonies from Rhey and Racel Gonzales who provided a direct account of how Salve beat Ronald, and medical reports from Dr. Filemon C. Porciuncula, Jr. linking the injuries sustained by Ronald to the blows from the broom's wooden handle.

2. **Rejection of Accidental Injury Claim:**

- Salve's defense that Ronald had sustained the fatal injury from a fall was discredited by Dr. Porciuncula's expert testimony, which stated that the injuries were not consistent with a fall and more likely caused by blunt force trauma.

3. **Mitigating Circumstance:**

- The Court rejected the appellant's claim for the mitigating circumstance of lack of intention to commit so grave a wrong. The Court opined that Salve's actions were

sufficiently brutal and cruel to produce the death of the victim, thus negating any mitigating circumstances.

4. **Damages:**

- The Supreme Court affirmed the awards of civil indemnity (P75,000), moral damages increased to (P75,000), exemplary damages increased to (P75,000), and added temperate damages of (P50,000) with 6% interest per annum from the finality of the decision until fully paid.

Doctrine:

In a parricide case, the presence of direct positive testimonies identifying the accused and linking the causation of death to their actions outweighs defenses of denial or claims of accidental injuries. Physical evidence acts as a corroborative element, reinforcing witness testimonies and providing compelling proof against weaker defenses like denial.

Class Notes:

1. **Elements of Parricide (Article 246, RPC):**

- A person was killed.
- The accused is the killer.
- The deceased is a close relative of the accused (child, spouse, parent).

2. **Article 246 of the Revised Penal Code:**

- **Parricide:** Any person who shall kill his father, mother, or child, whether legitimate or illegitimate, or any of his ascendants, or descendants, or his spouse, shall be punished by reclusion perpetua to death.

3. **Witness Credibility:**

- Eyewitness accounts, especially from minors without visible ill intent, hold significant weight in court.
- Medico-legal reports and expert testimonies corroborate witness accounts.

4. **Mitigating Circumstance:**

- **Lack of intention to commit so grave a wrong** can be a mitigating factor but cannot be utilized when the accused actions were sufficiently brutal to naturally cause the death.

Historical Background:

The case arises from socio-economic conditions in the Philippines where issues of child abuse are apparent among distressed families. The crime of parricide and domestic violence

is particularly troubling given the cultural values of family solidarity and parental authority in Filipino society. The strict legal repercussions against those who commit such crimes reflect the gravity with which the judicial system views familial violence.