

****Title:****

People of the Philippines vs. Fernando Iligan y Jamito and Edmundo Asis y Iligan

****Facts:****

On August 4, 1980, at around 3:00 a.m., Esmeraldo Quiñones Jr. and his companions, Zaldy Asis and Felix Lukban, were returning from a fiesta dance in Sto. Domingo, Vinzons, Camarines Norte. They encountered Fernando Iligan, Edmundo Asis, and Juan Macandog. Edmundo Asis pushed them, prompting Zaldy Asis to retaliate by boxing him. Fernando Iligan then attempted to hack Zaldy Asis with a bolo but missed. The trio ran away, pursued by the accused. They stopped running near Quiñones Jr.'s house and were about to proceed when the accused reappeared. Fernando Iligan hacked Quiñones Jr. on the forehead, causing him to fall. The attackers fled, and Zaldy Asis and Felix Lukban later found Quiñones Jr. dead from severe head injuries.

An information for murder was filed against Iligan, Asis, and Macandog (who remained at large). The deceased's body showed significant head trauma, confirmed by an autopsy performed by Dr. Marcelito E. Abas. The death certificate initially stated Quiñones Jr. died from a vehicular accident. The accused denied involvement, insisting they were home at the time.

The trial court found the accused guilty of murder and sentenced them to reclusion perpetua, citing treachery and premeditation as aggravating circumstances. They appealed the conviction, asserting the victim died in a vehicular accident, relying on Dr. Abas's testimony.

****Issues:****

1. Whether Iligan and Asis were guilty of murder, or if Quiñones Jr.'s death was the result of a vehicular accident.
2. The applicability of aggravating circumstances of treachery and premeditation.
3. Whether Asis could be held criminally liable as a co-conspirator.
4. The determination of Iligan's criminal responsibility under Article 4 of the Revised Penal Code.

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

1. ****Murder vs. Vehicular Accident:****

The Supreme Court found that Quiñones Jr. was indeed hacked by Iligan, causing him to fall onto the highway and subsequently be run over by a vehicle. The hacking was the proximate

cause of Quiñones Jr.'s death, fulfilling the requisites under Article 4 of the Revised Penal Code.

2. **Aggravating Circumstances:**

The Supreme Court ruled that the lower court erred in finding treachery and evident premeditation. The suddenness of the attack and the subsequent chase gave warning to the victims, negating treachery. Evident premeditation was not proved due to the lack of evidence on the time and plan to commit the crime.

3. **Liability of Edmundo Asis:**

The evidence against Edmundo Asis was insufficient to hold him liable as a co-conspirator. His presence at the scene and mere knowledge of Iligan's actions did not constitute active participation or conspiracy.

4. **Criminal Responsibility of Iligan:**

Iligan was held criminally liable for homicide due to the proximate cause principle under Article 4 of the Revised Penal Code. The hacking incident set off a chain of events leading to Quiñones Jr.'s death, thus incurring liability on Iligan's part.

Doctrine:

The doctrine reiterated in this case is that under Article 4 of the Revised Penal Code, criminal liability is incurred for any person committing a felony, even if the wrongful act done is different from that intended. The principle of proximate cause, "el que es causa de la causa es causa del mal causado," is applied, where the initial act sets off a chain of events leading to the injury or death.

Class Notes:

- **Article 4, Revised Penal Code:** Criminal liability for any person committing a felony, regardless of the resultant wrongful act.
- **Proximate Cause:** The direct and foreseeable connection between the offender's act and the resultant harm.
- **Treachery:** Requires deliberate and chronic planning of means, not just sudden attacks.
- **Evident Premeditation:** Requires clear evidence of planning, decision to commit the act, and time to reflect.

Historical Background:

During the early 1980s, the Philippine justice system was under significant scrutiny and

pressure to uphold laws strictly due to prevalent violence and crime rates. This case highlights the intricacies of proving criminal liability and the stringent requirements for applying aggravating circumstances such as treachery and evident premeditation, reflecting the judiciary's commitment to a fair and thorough evaluation of criminal cases.