

Title

Guevarra v. People, G.R. No. 726 Phil. 183, October 24, 2005

Facts

Step-by-Step Sequence

1. **Incident Date**: The crimes occurred on November 8, 2000.
2. **Location**: Municipality of Alicia, Isabela, Philippines.
3. **Victims**: Erwin and David Ordoñez.
4. **Assailants**: Rodolfo and Joey Guevarra.
5. **Events Leading Up**:
 - Erwin, David, and Philip Vingua allegedly forced their way into Rodolfo Guevarra's compound and threw stones at his house and tricycle.
 - Rodolfo confronted them, and David purportedly attacked him with a "panabas," which Rodolfo parried and retaliated using a bolo.
6. **Defense's Version**:
 - Rodolfo and Joey claimed to have acted in self-defense when Erwin, David, and Philip forcibly entered their property and initiated an attack.
 - Insurance included testimonies from neighbors to substantiate this.
7. **Prosecution's Version**:
 - Erwin testified they were walking by, and suddenly Joey attacked David while Rodolfo assaulted Erwin.
 - Claimed the gate was only damaged after David was being dragged into the compound.
8. **Trial and Lower Court Decisions**:
 - Both Rodolfo and Joey were found guilty by the RTC of frustrated homicide and homicide.
 - The Court of Appeals affirmed the RTC's decision but modified the damages awarded.

Issues

1. **Self-Defense Claim**: Whether the CA erred in failing to appreciate the presence of self-defense claimed by the petitioners.
2. **Credibility of Testimony**: Whether the CA erred in giving full credence to Erwin's testimony, the lone witness for the prosecution.
3. **Involvement of Joey Guevarra**: Whether Joey Guevarra had participation in the said incident.

Court's Decision

Issue 1: Self-Defense Claim

- **Ruling**: The Supreme Court upheld the CA's decision, citing a lack of clear and

convincing evidence to prove unlawful aggression from Erwin and David.

- **Reasoning**:
- The absence of unlawful aggression negates the presence of self-defense.
- The number and location of wounds demonstrated intent to kill rather than self-defense.

Issue 2: Credibility of Testimony

- **Ruling**: The Court found the testimony of Erwin credible.
- **Reasoning**:
- Erwin's testimony was consistent and corroborated by physical evidence.
- The trial court's assessment of witness credibility deserves respect given their vantage position.

Issue 3: Involvement of Joey Guevarra

- **Ruling**: Joey Guevarra's culpability was affirmed.
- **Reasoning**:
- Evidence showed that Joey also participated in the attack, as illustrated by multiple wounds on Erwin and David.

Doctrine

- **Self-Defense Requires Unlawful Aggression**: Self-defense cannot be invoked without clear evidence of unlawful aggression.
- **Importance of Credible Testimony**: Consistent and credible witness testimony, corroborated by physical evidence, holds weight.

Class Notes

Key Elements of Crimes Discussed:

- **Frustrated Homicide**:
- Intent to kill.
- Victim sustaining fatal wounds, but surviving due to timely medical assistance.
- Absence of qualifying circumstances.

- **Homicide**:
- Person killed.
- Absence of justifying circumstances.
- Presumption of intent to kill.
- Absence of qualifying elements (murder, parricide, infanticide).

Relevant Statutes:

- **Article 11 and 12 of the Revised Penal Code**:
- Articles delineate the parameters for justifying circumstances like self-defense.

Historical Background

Contextual Overview

- During the early 2000s, increased attention in Philippine jurisprudence focused on self-defense claims in homicide cases.
- This case illustrates the judiciary's stringent requirements for invoking self-defense, emphasizing unlawful aggression and consistency in witness testimonies.
- It serves as a critical precedent due to its in-depth exploration and strict interpretation of self-defense parameters, pivotal for legal study and subsequent case law development.