

****Title:**** People of the Philippines vs. William Sabalberino y Abulencia

****Facts:****

On August 17, 2005, at around 1:00 AM in Barangay 59, Picas, Sagkahan, Tacloban City, William Sabalberino stabbed his wife, Delia Fernandez-Sabalberino, resulting in her death. Delia's children, Angela and Jessica, were awakened by their parents' quarrel. They witnessed William punch Delia, after which he went to the kitchen, retrieved a knife, and stabbed her in the chest. Delia attempted to walk towards the door but collapsed and died.

William claimed the stabbing was accidental. He alleged that he had seen Delia with another naked man upon waking up to urinate at midnight. In his attempt to stab the man, he claimed his wife accidentally came between them and was struck instead.

Upon arraignment on March 21, 2006, William pleaded not guilty. The trial ensued, where the prosecution presented testimonies from Angela and Jessica corroborating the stabbing incident and refuting William's claim of another man's presence.

The RTC convicted William of parricide and sentenced him to reclusion perpetua on February 24, 2016. He appealed to the CA, reiterating his defense and citing mitigating circumstances, but the CA affirmed the RTC decision with modifications on damages.

William filed a notice of appeal to the Supreme Court after his motion for reconsideration was denied by the CA. The OSG and William's counsel filed manifestations adopting their briefs before the CA without submitting supplemental briefs.

****Issues:****

1. Whether the CA correctly upheld the conviction of William Sabalberino for parricide.
2. Whether Article 247 of the Revised Penal Code, regarding a spouse surprising the other in the act of sexual intercourse with another, applies.
3. Whether mitigating circumstances of passion and obfuscation, lack of intention to commit so grave a wrong, and voluntary surrender should be appreciated.

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

1. ****Conviction of Parricide:****

- ****Parricide Elements:**** The Supreme Court agreed with the lower courts that the elements of parricide were present:

- Delia was killed.
- William caused the death by stabbing her.

- Delia was his lawful wife.
- **Eyewitness Testimonies:** The consistent and corroborated testimonies of Angela and Jessica, who were inside the house and witnessed the incident, were credible and supported the conviction.
- **William's Admission:** William admitted to stabbing Delia, though he claimed it was accidental.

2. **Article 247 Exemption:**

- **Non-Applicability:** The Court found William's version of events unconvincing. The defense failed to prove that William surprised Delia in the act of sexual intercourse with another man or acted immediately thereafter. The testimonies of Angela and Jessica confirmed that no other man was present.

3. **Mitigating Circumstances:**

- **Passion and Obfuscation:** The argument between William and Delia, although heated, did not amount to intense passion or obfuscation that could mitigate the crime.
- **Voluntary Surrender:** The evidence did not support a finding of voluntary surrender since William did not voluntarily present himself to the authorities unconditionally or acknowledge his guilt.
- **Lack of Intention to Commit Grave Wrong:** The use of a lethal weapon and the fatal wound inflicted demonstrated an intent to cause significant harm, negating this mitigating circumstance.

The Supreme Court affirmed the CA's decision, imposing reclusion perpetua on William and maintaining the award of damages, including civil indemnity, moral damages, exemplary damages, temperate damages, and interest at 6% per annum from finality until fully paid.

Doctrine:

- **Parricide:** Defined under Article 246 of the Revised Penal Code as the killing of a father, mother, or child, whether legitimate or illegitimate, or of any other legitimate ascendant or descendant, or of the legitimate spouse.
- **Article 247 of the RPC:** Absolves a legally married person from certain repercussions when killing a spouse caught in the act of intercourse with another person, provided the act is done during or immediately after witnessing the act.

Class Notes:

1. **Elements of Parricide:**

- Victim is killed.
- Accused caused the death.
- Victim is a close relative or spouse.
- Citation: Article 246, Revised Penal Code.

2. **Article 247 Exemption:**

- Must surprise spouse in the act of sexual intercourse.
- Act immediately or right thereafter.
- Proof by clear and convincing evidence.
- Citation: Article 247, Revised Penal Code.

3. **Mitigating Circumstances:**

- Passion and Obfuscation: Must arise from lawful feelings.
- Voluntary Surrender: Must be spontaneous, unconditional.
- Lack of Intention to Commit Grave Wrong: Evaluated by weapon used and injury caused.

Historical Background:

The case provides an exemplary analysis of the relevance of eyewitness testimonies, the importance of clear and consistent evidence in criminal trials, and how claimed defenses under specific provisions of the Revised Penal Code are scrutinized. The court's decisions emphasize the importance of immediately establishing facts and credibility in cases involving domestic disputes and violent crimes within family settings.