

****Title:**** *Benjamin M. Oliveros, Jr., Oliver M. Oliveros, and Maximo Z. Sotto vs. People of the Philippines*

****Facts:****

On October 30, 2013, around 5:30 PM, Glenn F. Apostol was buying fish with his father, Virgilio, at the public market in Binmaley, Pangasinan. They encountered Benjamin and Oliver Oliveros, neighbors, which led to a verbal confrontation initiated by their sister Mimielyn Oliveros, who accused Glenn of spreading rumors. This escalated into a physical altercation where Benjamin and Oliver, along with Maximo Sotto, another relative, attacked Glenn using bolos. Benjamin hacked Glenn's face and shoulder while Oliver and Maximo assaulted Virgilio. The attack resulted in severe injuries to Glenn, including deep cuts and fractures. The police arrived and arrested Benjamin and Oliver, while Maximo and Mimielyn fled.

The trial proceeded, with the RTC of Lingayen finding the accused guilty of Frustrated Murder on November 16, 2015. The court sentenced them to eight to fourteen years of imprisonment and ordered them to pay damages. The convicted parties appealed to the CA, which affirmed the RTC's decision with modifications to the damages awarded. A further appeal to the Supreme Court was made, which reconsidered the case based on the evidence presented.

****Issues:****

1. Whether the Court of Appeals erred in affirming the conviction of petitioners for Frustrated Murder.
2. Whether there was an unlawful aggression on the part of the victim, Glenn.
3. Whether the intent to kill was sufficiently proven by the prosecution.
4. Whether the petitioners acted in self-defense or under the justifying circumstances of defense of a relative or stranger.
5. Whether the injuries sustained by Glenn were fatal and capable of causing death without timely medical intervention.

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

1. ****Conspiracy and Abuse of Superior Strength:**** The Court held that there was sufficient evidence proving the conspiracy among the petitioners to attack Glenn. The acts performed by Benjamin, Oliver, and Maximo demonstrated a coordinated effort to inflict harm, evidencing their shared intent.

2. **Intent to Kill:** The Court concluded that Glenn's attackers intended to kill him as substantiated by the multiple hacks directed at his face and shoulder, considering they continued the assault even after Glenn was injured and tried to escape.

3. **Defense of Relative/Stranger and Unlawful Aggression:** The Court rejected the defense's argument of acting in defense of a relative or stranger, noting inconsistent testimonies and the lack of clear evidence showing Glenn was the unlawful aggressor. The Court found the use of bolos against Glenn's bare hands disproportional, negating the claim of reasonable necessity.

4. **Fatal Nature of Injuries:** The Court modified the conviction from Frustrated Murder to Attempted Murder. The medico-legal testimony only suggested that Glenn's injuries might lead to death through infection or tetanus unless treated. The lack of clear evidence on the fatality of the wounds without medical intervention warranted this adjustment.

Doctrine:

1. **Conspiracy** - Established when parties have a common design to commit a felony, inferred through their actions.
2. **Superior Strength** - Enhances liability as an aggravating circumstance when the offender uses means significantly overpowering the victim's capacity to defend.
3. **Intent to Kill** - Inferred from the nature, location, and number of wounds inflicted, alongside the aggressors' conduct before and during the act.
4. **Staged Crime (Attempted vs. Frustrated)** - The classification depends on whether the injuries would independently cause death without medical intervention.

Class Notes:

- **Elements of Attempted Murder:**

1. Intent to kill.
2. Over acts aimed at implementing the kill.
3. Failure to execute due to reasons outside the perpetrator's control.

- **Defenses in Criminal Law:**

- **Self-defense:** Legitimate defense of oneself.
- **Defense of Relatives:** Requires unlawful aggression, reasonable means to repel, and non-provocation.
- **Statutory Provisions:** Article 11 (Self-Defense, etc.), Article 6 (Stages of Criminal Execution), Article 248 (Murder), Article 50 (Penalty reduction for attempted crimes), Article 51 (Attempted Felony).

****Historical Background:****

This case resides in the context of local familial and neighborly disputes escalating into violence. It exemplifies ongoing socio-legal challenges in maintaining public order within community environments typically marred by personal vendettas. The involvement of market areas, a common public space, underscores the societal impact and the urgency of legal interventions to uphold the rule of law.

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The case brief provides a structured analysis to help law students understand key legal principles, procedural history, and the Court's reasoning for decisions. The explanation and simplification aim to assist in quick recall and applicability in academic discussions.