

****Title:**** People of the Philippines vs. Eduardo Basin Javier

****Facts:****

On June 15, 1996, in Sto. Tomas, La Union, Eduardo Javier hacked his wife, Florentina Javier, with a bolo, resulting in her immediate death. Eduardo and Florentina had been married since December 18, 1954, and they lived in Tubod, Sto. Tomas, La Union, along with their daughter Alma Javier. Florentina was heard screaming for help by her daughter Consolacion Javier Panit, who called her siblings for assistance.

Upon arriving at the scene, Manuel Javier, the couple's son, found their mother dead and their father wounded. Manuel reported that his father confessed to the killing and subsequently stabbed himself. SPO1 Rotelio Pacho testified to the police investigation and the recovery of a bloodstained bolo. The victim suffered multiple injuries, with her neck nearly severed.

Eduardo Javier admitted to the killing and claimed insanity as his defense, asserting he could not sleep for a month prior to the incident. The trial court, however, found no evidence to support his claim of insanity and subsequently convicted him of parricide, sentencing him to death.

Eduardo appealed, arguing for mitigating circumstances of illness and passion and obfuscation, but the Office of the Solicitor General contended that there was insufficient evidence for these claims.

****Issues:****

1. Whether the trial court erred in rejecting the defense of insanity.
2. Whether the trial court erred in not appreciating the mitigating circumstances of illness and passion and obfuscation, thereby incorrectly imposing the death penalty.

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

1. ****Rejection of Insanity Defense:****

- The trial court dismissed Eduardo Javier's insanity plea due to lack of medical evidence and expert testimony verifying his mental state during the incident.
- The Supreme Court affirmed that without medical records or psychiatric confirmation, the defendant's claim remained unsubstantiated.

2. **Mitigating Circumstances of Illness:**

- For illness to mitigate criminal liability, evidence must show that the illness diminished will-power without depriving consciousness of acts.
- The Supreme Court agreed with the trial court that Javier's detailed recollection of the event contradicted his claim of diminished will-power, and thus, the mitigating circumstance of illness was not applicable.

3. **Mitigating Circumstances of Passion and Obfuscation:**

- The elements require an unlawful act causing a strong emotional response immediately preceding the crime.
- The Court found no evidence or testimony suggesting Eduardo acted out of passion and obfuscation. As per his own admission, jealousy was not a factor, and there was no clear inciting act producing mental disturbance immediately before the crime.

4. **Penalty:**

- Supreme Court concluded no mitigating or aggravating circumstance was proven, thus, per Article 246 of the Revised Penal Code (as amended by R.A. 7659), the appropriate penalty for parricide should be reclusion perpetua, not death.
- Civil indemnity of P50,000.00 was affirmed as rightly awarded for the spouse's death.

Doctrine:

The case reiterates that to claim the defense of insanity, sufficient and convincing medical evidence must be presented. Additionally, claims of mitigating circumstances like illness and passion and obfuscation must be adequately supported by facts that diminish will-power or show a direct causal relationship to the crime. Claims without robust evidence or proof will not reduce criminal liability or the penalty.

Class Notes:

- **Parricide:** Defined under Article 246 of the Revised Penal Code, as amended by R.A. 7659.
- **Insanity Defense:** Article 12 of the Revised Penal Code; requires proof of complete lack of discernment.
- **Mitigating Circumstances (Article 13, RPC):** Illness (requires proof of diminished will-power but retaining consciousness); Passion and Obfuscation (requires unlawful act provoking strong mental/emotional response).

Historical Background:

This case underlines the judiciary's rigorous standards in evaluating defenses related to mental health and mitigating circumstances. It reflects the consistent application of doctrines requiring substantial evidence to move away from the default penalties prescribed in the Philippine Revised Penal Code. The historical significance lies in the reinforcement of a disciplined approach in assessing criminal liability and the integrity of evidential requirements amidst defenses claiming diminished responsibility.