

Title: People of the Philippines vs. Edgar Dawaton

**\*\*Facts:\*\***

1. **\*\*Incident\*\***: On September 20, 1998, Esmeraldo Cortez hosted a drinking session at his house in Sitio Garden, Brgy. Paltic, Dingalan, Aurora. Present were Edgar Dawaton, Leonides Lavares, and Domingo Reyes. They consumed a significant amount of gin.
2. **\*\*Relocation\*\***: Around 3:00 p.m., they moved to Amado Dawaton's house where they continued drinking. Amado was not present.
3. **\*\*Murder\*\***: At around 3:30 p.m., Edgar Dawaton, after leaving briefly, returned with a stainless knife and stabbed the sleeping Leonides multiple times in the neck. Despite Leonides' attempts to flee, Edgar pursued and continued stabbing him until he died.
4. **\*\*Witnesses\*\***: Esmeraldo Cortez and Domingo Reyes, who were present, testified seeing the attack. Edgar fled to his uncle Carlito Baras' home where he was later arrested by police.

**\*\*Procedural Posture:\*\***

- **\*\*Arrest & Charges\*\***: Edgar was arrested on September 21, 1998. An information for murder qualified by treachery and evident premeditation was filed on March 11, 1999.
- **\*\*Trial Court\*\***: After a trial where multiple witnesses testified, the Regional Trial Court on November 20, 1999 found Dawaton guilty of murder and sentenced him to death.
- **\*\*Appeal\*\***: The case was brought to the Supreme Court for automatic review under its decision-making power in capital cases.

**\*\*Issues:\*\***

1. **\*\*Whether the attack was attended by treachery.\*\***
2. **\*\*Whether the mitigating circumstances, such as a plea of guilty, voluntary surrender, or passion and obfuscation, should be appreciated in Dawaton's favor to reduce his culpability.\*\***
3. **\*\*Whether the penalty should be modified in light of possible mitigating circumstances.\*\***

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

1. **\*\*Treachery\*\***: The Supreme Court affirmed the trial court's finding of treachery. Leonides was asleep and intoxicated, making him unable to defend himself. Edgar's sudden and deliberate attack constituted treachery.

2. **Mitigating Circumstances**:

- **Plea of Guilty**: The Court rejected Edgar's plea for leniency based on his offer to plead guilty to homicide, as it was not accepted by the prosecution and he had already pleaded not guilty to murder.
- **Voluntary Surrender**: The claim of voluntary surrender was dismissed; the Court highlighted that Edgar was attempting to escape when the police found him.
- **Passion and Obfuscation**: The Court found no evidence of Edgar acting in a state of passion or obfuscation; witness testimonies indicated no prior altercation or threats involving a grenade as claimed by Edgar.

3. **Intoxication**: The Court accepted intoxication as a mitigating circumstance because Edgar had been drinking heavily but found no habitual or intentional intoxication. Thus, required penalty adjustment due to intoxication as per Article 15 of the Revised Penal Code.

**Doctrine**:

- **Treachery**: Established when an attack is sudden and unexpected, rendering the victim defenseless.
- **Intoxication as a Mitigating Circumstance**: Recognized under Article 15, if not habitual or planned.
- **Voluntary Surrender**: Not acknowledged merely by presence at a location or lack of escape; must show intent to submit to authorities.

**Class Notes**:

- **Treachery**: The sudden, unexpected attack on an unsuspecting victim ensures the attacker's safety and completes the crime without risk.
- **Article 63 of Revised Penal Code**: When two indivisible penalties are available, mitigating circumstances with no aggravating circumstances result in the lesser penalty.
- **Intoxication (Article 15)**: Mitigating if there is no habitual consumption or intent to intoxicate oneself for crime facilitation.
- **Voluntary Surrender (Article 13(7))**: Requires the offender to submit to authorities showing recognition of guilt or intent to avoid effort and expense in apprehension.

**Historical Background**:

This case took place in the context of updated criminal judicial procedures in the late 1990s Philippines, highlighting rigorous standards for affirming guilt and sentencing, particularly

focusing on the death penalty and its ethical parameters. The decision reflects a judicious balance between adhering to due process and imposing appropriate legal penalties while considering mitigating factors, amidst prevailing debates on the death penalty's constitutionality and ethical implications.