

Title: People of the Philippines vs. Domingo Ural (G.R. No. L-29284)

Facts:

On July 31, 1966, Brigido Alberio, a former detention prisoner, went to the municipal building in Buug, Zamboanga del Sur, around 8:00 PM, where he witnessed Policeman Domingo Ural beating the detainee, Felix Napola, until Napola collapsed. Ural then exited but returned with a bottle, poured its contents on Napola, and set him on fire. Napola screamed for help, which went unanswered. Alberio, threatened by Ural to remain silent, left the building and hitchhiked home.

Dr. Luzonia R. Bakil, the municipal health officer, found Napola with severe burns and without proper treatment indicated the burns would be fatal. Napola ultimately died on August 25, 1966. The sanitary inspector listed "burn" as the cause of death.

At trial, Ural claimed he found Napola in flames and, with help, removed Napola's burning shirt but did not call a doctor due to Napola's assurances. Felicisima Escareal testified in favor of Ural but was deemed untrustworthy by the trial court. Policeman Teofilo Matugas provided an alibi for Ural, stating Alberio wasn't in the municipal building. The lower court convicted Ural of murder and sentenced him to reclusion perpetua, acknowledging the weak prosecution yet validating Alberio's consistent testimony over Ural's denials.

Procedural Posture:

- Initial Investigation: Basic testimonies were gathered, including a joint affidavit by prisoners Ernesto Ogoc and Juanito de la Serna recounting Ural's actions.
- Trial: Held in the Court of First Instance of Zamboanga del Sur, presided by Judge Vicente G. Ericta, culminated in a murder conviction based on Alberio's testimony.
- Appeal: Ural appealed, focusing on the credibility of Alberio and sufficiency of evidence.

Issues:

1. The credibility of Brigido Alberio's testimony vs. the defense's claims.
2. Whether Ural's actions constituted murder and if there was intent to kill.
3. The applicability of mitigating and aggravating circumstances in sentencing.

Court's Decision:

1. **\*\*Credibility of Alberio's Testimony:\*\***

The Supreme Court supported the trial court's decision to believe Alberio over Ural, citing consistent and undisturbed testimony. The trial court's firsthand observation of demeanor held significant weight, emphasizing the credibility of Alberio over Ural's denials.

2. **Classification of the Crime:**

The Supreme Court deemed that Ural's act of setting Napola on fire fell under murder by means of fire per Article 248 of the Revised Penal Code. Citing legal doctrine, the court stressed that criminal liability persists even if the act leads to unintended consequences (Article 4 of the Revised Penal Code).

3. **Sentencing Considerations:**

The Court validated the finding of the aggravating circumstance of abuse of public position. However, it also recognized the mitigating circumstance that Ural apparently had no intent to kill (Article 13(3), RPC), balancing the sentence appropriately at reclusion perpetua, the medium period for murder.

Doctrine:

- **Criminal Liability for Different Consequences (Art. 4, RPC):** A felony incurs liability even if the true resultant harm was unintended.
- **Abuse of Public Position (Art. 14(1), RPC):** Crimes committed with this aggravating factor enhance criminal liability.
- **Mitigating Circumstance of No Intent to Kill (Art. 13(3), RPC):** Lesser intent to commit harm can mitigate punishment severity.

Class Notes:

- **Key Elements:** (a) Intentional Felony (Art. 4, RPC), (b) Aggravating Circumstance - Abuse of Public Position (Art. 14(1), RPC), (c) Mitigating Circumstance - No Intent to Commit Serious Harm (Art. 13(3), RPC).
- **Application:** The case illustrates how intent, statutory aggravating factors, and mitigating circumstances influence the classification and severity of penalties.

Historical Background:

This case reflects mid-20th-century Philippine legal standards on police brutality and public officer misconduct, emphasizing stringent penalties for public officials exploiting their positions to harm detainees. The societal backdrop shows heightened scrutiny of police activity post-colonial era, advocating stricter protections for detainees.