

****Title:****

People of the Philippines vs. Willie Amaguin, Gildo Amaguin, and Celso Amaguin

****Facts:****

On 24 May 1977, Pacifico Oro hosted a small gathering at his house in Divinagracia Street, La Paz, Iloilo City, for the town fiesta. At approximately 5 PM, as Pacifico and his companions (Hernando Oro, Diosdado Oro, Danilo Oro, Rafael Candelaria, and Sergio Argonzola) were leaving, Celso Amaguin called Pacifico and subsequently attacked him with a butcher's knife. Gildo Amaguin followed and hit Danilo with a dart from a slingshot before stabbing Diosdado. Willie Amaguin emerged with a handgun and shot Pacifico, Diosdado, and the fleeing Danilo. While pleading for his life, Diosdado was fatally shot by Willie, who also repeatedly fired at Pacifico as Gildo and Celso continued stabbing him.

The defense, in contrast, argued that the Oro brothers initiated the fight. According to Gildo, Pacifico and his group assaulted Celso and a subsequent skirmish ensued, involving knives, slingshots, and a handgun, resulting in multiple injuries on both sides. The trial court, having assessed the credibility of the witnesses, found the prosecution's version more credible and thus convicted Gildo for murder and Willie as an accomplice.

****Issues:****

1. Whether the trial court erred in classifying the offense as murder.
2. The identification of Willie as one of the involved perpetrators.
3. Existence of conspiracy between Gildo and Celso Amaguin.
4. The issue of weapons allegedly used by Gildo.
5. Voluntary surrender as a mitigating circumstance and individual liability of the accused.

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

1. ****Classification of the Offense as Murder:****

- The Supreme Court questioned the trial court's classification of the killing as murder. It evaluated if treachery was present, concluding that while the attack was frontal, the method did not insulate the aggressors from risk, as it was highly probable the victims could have resisted, as evidenced by the mutual injuries sustained. Without clear evidence of treachery, the killings could not be classified as murder but rather homicide.

2. ****Identification of Accused Willie Amaguin:****

- The credibility of the witnesses in identifying Willie was upheld. It was emphasized that

even a sole credible and positive identification, as in the case of Hernando Oro pointing to Willie as the gunman, holds enough weight in law to establish involvement beyond reasonable doubts. The Court supported the factual findings of the trial court.

3. **Conspiracy between Gildo and Celso Amaguin:**

- Clear evidence displayed that Gildo and Celso acted in unity intending to jointly assault the Oro brothers. Actions such as Gildo's use of a slingshot and knife in coordination with Celso's attack showed a concerted effort implying conspiracy.

4. **Armament of Gildo:**

- Gildo's defense that he was only armed with stones was rejected. The Court accepted the prosecution's version, depicting Gildo with a slingshot and knife as more credible.

5. **Voluntary Surrender and Individual Liability:**

- The Court recognized the mitigating circumstance of voluntary surrender for both Willie and Gildo, who turned themselves in voluntarily. However, it ruled that Willie was liable individually for the fatal shooting of Diosdado (Homicide) and the wounding of Pacifico (Frustrated Homicide), independent of the conspiracy.

Doctrine:

- A frontal assault can qualify as treacherous if it is sudden and unexpected, hindering the victim's ability to retaliate.
- Positive identification by a credible witness, even if solitary, is sufficient for a conviction.
- Voluntary surrender can mitigate penal implications if it happens before an actual arrest.
- Conspiracy does not need prior agreement; concerted actions towards a common felony adequately indicate it.

Class Notes:

- **Treachery (Alevosia):** Treachery must employ means ensuring execution without risk from defense attempts by the offended party.
- **Conspiracy:** Concerted actions indicating a common, felonious objective imply conspiracy without needing explicit prior agreement.
- **Voluntary Surrender:** Aggravated by factors of timeliness and before effecting an arrest, it mitigates culpability.
- **Individual Liability vs. Conspiracy:** Where insufficient evidence indicates involvement in a conspiracy, individual actions and their natural consequences are solely attributable.

Historical Background:

The case illustrates the jurisprudential balancing of credibility, procedural justice, and statutory interpretation concerning treachery and conspiracy within mid-20th century Philippines. These legal principles resonate through the nation's criminal jurisprudence, reinforcing doctrines relevant to present-day cases.

****References:****

- Art. 14, Revised Penal Code
- Art. 249, Revised Penal Code
- Supreme Court decisions on similar jurisprudence: People vs. Deuna, People vs. Clapano, People vs. Ramilla, and others.