

****Title:****

Ricardo Balunueco vs. Court of Appeals and the People of the Philippines, G.R. No. 123456, February 7, 2000

****Facts:****

On May 2, 1982, at around 6:00 PM, Amelia Iguico witnessed her brother-in-law Servando Iguico being chased by Ricardo Balunueco, his brothers Reynaldo, Ramon, and their father Juanito, along with Armando Flores. Servando fled into Amelia's house, while her husband Senando, cooking unaware of the chase, stepped out and was attacked by the group. Armando hit Senando with a stone, and Ricardo struck Senando with an ax multiple times. When Ricardo lost his grip on the ax, someone threw him a bolo, which he used to continue hacking Senando. Amelia tried to protect her husband, resulting in her getting wounded on the leg.

The incident led to the deaths of Senando Iguico and the injury of Amelia Iguico. Post-mortem findings by Dr. Maximo Reyes revealed two stab wounds and nine hack wounds on Senando, with the cause of death being acute hemorrhage due to these wounds.

Ricardo defended that he acted in the defense of his brothers, whom he claimed were being attacked by Senando. Witness Manuel Flores corroborated Ricardo's account, claiming Senando initiated the aggression.

****Procedural Posture:****

1. The Regional Trial Court (RTC) of Pasig City convicted Ricardo Balunueco of homicide for Senando's death and frustrated homicide for Amelia's injuries.
2. Ricardo appealed to the Court of Appeals (CA).
3. The CA affirmed the homicide conviction but reduced the conviction regarding Amelia's injury to attempted homicide.
4. Ricardo appealed to the Supreme Court, arguing:
 - He acted in defense of his relatives.
 - The trial court unduly relied on the testimony of Amelia Iguico.
 - The trial court ignored the injuries suffered by him and his brother Reynaldo.

****Issues:****

1. Whether Ricardo Balunueco acted in defense of his relatives.
2. Whether the testimony of Amelia Iguico was credible.
3. Whether Ricardo's actions constituted homicide and frustrated homicide or if they should

be considered under self-defense.

4. Whether the injuries to Amelia Iguico should be classified as attempted homicide or a lesser offense.

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

****Issue 1: Defense of Relatives****

The Supreme Court held Ricardo failed to prove unlawful aggression by Senando, crucial for invoking defense of relatives under Art. 11, par. 2 of The Revised Penal Code. The injuries on Ricardo and his brothers were minor compared to the fatal wounds of Senando, suggesting the aggression came from Ricardo and his group.

****Issue 2: Credibility of Testimony****

The Supreme Court affirmed the credibility of Amelia Iguico. The consistency of her account despite her relationship to the victim added reliability, and her testimony was found clear and straightforward.

****Issue 3: Classification of the Acts****

The appeal court's assessment of the homicide charge stood firm. However, for the attack on Amelia, the Supreme Court found evidence did not prove Ricardo's intent to kill Amelia beyond a reasonable doubt. Thus, they modified the conviction to slight physical injuries.

****Issue 4: Nature of Amelia's Injuries****

Based on Amelia's injuries and the circumstances, the Court classified the acts as slight physical injuries under Art. 266, par. 1, of The Revised Penal Code, assigning the penalty of arresto menor.

****Doctrine:****

1. Defense of relatives requires proof of unlawful aggression.
2. Relationship to the victim does not automatically taint a witness's credibility.
3. For convictions of attempted or frustrated homicide, intent to kill must be proven beyond reasonable doubt.

****Class Notes:****

- ****Elements of Defense of Relatives (Art. 11, The Revised Penal Code):****

1. Unlawful aggression by the assailant.
2. Reasonable necessity of the means employed to prevent or repel it.
3. Lack of sufficient provocation by the person defending.

- **Slight Physical Injuries (Art. 266, The Revised Penal Code):**

Punishable by arresto menor (1-30 days) when the injury does not incapacitate the person for labor or medical attendance exceeds 10 days.

- **Key Statutes:**

Art. 11 and Art. 266 of The Revised Penal Code.

Historical Background:

This case reflects the judicial processes of resolving conflicting testimonies and the rigorous standards courts apply to claims of self-defense and defense of relatives in Philippine criminal law. The inclusion of family dynamics in criminal cases highlights the law's nuanced consideration of motive and intent amid familial violence.