

Title: People of the Philippines vs. Renato Aldemita y Malihan

Facts:

On March 5, 1976, Erlinda Viardo, the managing partner of Carlos Valdez and Company, was attending a meeting in her office in Paco, Manila, with her secretary, Angelita Yambao. Renato Aldemita, an employee of the same firm as a liaison officer on BIR matters, entered the room with an object wrapped in newspaper—a jungle bolo. Without provocation, he attacked Yambao, injuring her hand and head, then turned on Viardo, inflicting multiple hack wounds.

Maria Trinidad Ochoa Francisco, another secretary, witnessed Aldemita entering Viardo's office with a suspicious object. Upon hearing cries for help, she fetched a guard. Viardo's driver, Ricarte Corpus, saw Aldemita continuing his assault and attempted to pacify him, but Aldemita resisted and attempted to lock them out.

Police intervention eventually led to Aldemita surrendering. Viardo's lifeless body was found with numerous wounds, while witness testimonies confirmed the premeditated nature of the attack. Aldemita later revealed that he premeditated the murder and purchased the weapon days earlier.

Aldemita was committed to the National Mental Hospital for observation, delaying trial for two years, where he was diagnosed with schizophrenia. In his defense, he claimed insanity during the commission of the crime, supported by expert testimonies and family history of mental illness.

Issues:

1. Was Renato Aldemita legally insane at the time of the commission of the offense, exempting him from criminal liability?
2. Were the aggravating circumstances, such as treachery and abuse of superior strength, correctly applied in assessing Aldemita's criminal cases?

Court's Decision:

1. ****Issue of Insanity****: The Supreme Court ruled that the defense of insanity was not sufficiently proven. It upheld the presumption that all acts are voluntary unless clearly demonstrated otherwise. The behavior of Aldemita before, during, and after the crime (intellectually demanding actions like playing chess, carrying out office duties, and careful planning of the crime) indicated mental soundness at the time. The legal definition of insanity requires a complete deprivation of intelligence, which wasn't proven in Aldemita's

case.

2. **Application of Aggravating Circumstances**: The Court agreed with the trial court that the crime of murder was qualified by treachery and aggravated by the use of superior strength with no mitigating circumstances. However, lacking the requisite votes for the death penalty, the sentence was reduced to reclusion perpetua. The court affirmed the civil indemnities with an adjustment of P30,000 for the murder case as per prevailing jurisprudence at the time.

Doctrine:

- To successfully invoke insanity as a defense, there must be clear, convincing evidence that the accused was insane at the time of the crime, involving a total deprivation of reason and discernment. Abnormality of mental faculties is insufficient to exclude criminal liability.
- Aggravating circumstances such as treachery require deliberate design to ensure the execution of the criminal act without risk to the offender, manifestly evident in Aldemita's actions.

Class Notes:

- **Key Elements of Defending Insanity**: Clear evidence relating to the accused's mental state before or during the crime.
- **Article 12 of the Revised Penal Code**: Defence of insanity requires total deprivation of intelligence.
- **Aggravating Circumstances**: Requires demonstrating how the crime was executed with premeditated assurance of success.

Historical Background:

During the late 20th century in the Philippines, the legal system emphasized the rigorous burden of proof required for proving insanity as an exempting circumstance. The social stigma associated with mental illness made defenses relying on psychiatric evaluations particularly challenging, demanding incontrovertible expert testimony and substantial behavioral evidence at the time of the crime. This case took place during a period of evolving jurisprudence on psychological defenses and highlights the judiciary's cautious approach in recognizing such claims.