

Title: People v. Buenaflor

Facts:

On August 19, 1989, Isabella Federis and her boardmate, Imelda Barcebal, were returning to their boarding house in Naga City after a movie. Near the Naga City Post Office, Laroy Buenaflor approached, armed with a knife, and threatened Federis. Fleeing, Barcebal left Federis alone. Buenaflor dragged Federis to a dark area, forced her to the ground, and raped her.

Afterwards, Federis convinced Buenaflor to let her retrieve clothes and money from her boarding house. She informed her boardmates about the incident. Police apprehended Buenaflor based on Federis's description, and she identified him at the police station as her assailant.

Buenaflor was charged and convicted of rape by the trial court, sentenced to reclusion perpetua, and ordered to pay Federis P30,000. He appealed, asserting the court overlooked his mental condition and intoxication as mitigating circumstances.

Procedural Posture:

Buenaflor pled not guilty at trial, leading to a full trial and subsequent conviction on May 10, 1990. He appealed the ruling, claiming mental and intoxication issues as mitigating factors that were not given due consideration.

Issues:

1. Whether the trial court erred in not considering imbecility and drunkenness as mitigating circumstances.

Court's Decision:

The Supreme Court reviewed Buenaflor's claims:

1. Mental Incapacity Claim: His mental impairment, diagnosed as mild mental deficiency with reactive depression, did not equate to complete or substantial deprivation of intelligence necessary to classify as an imbecile under Article 12 of the Revised Penal Code, thus not exempting him from liability but recognized as a mitigating circumstance under Article 13(9), affecting willpower but leaving consciousness intact.

2. Intoxication Claim: The court found insufficient evidence to prove substantial or impactful intoxication, as Buenaflor's own testimony of being "a little bit drunk" lacked corroborating

evidence necessary to mitigate the offense under the required legal standards.

Ultimately, despite identifying the mitigating circumstance of mental impairment, the Supreme Court upheld the trial court's imposition of reclusion perpetua, noting that a single indivisible penalty applies regardless of mitigating factors per Article 63 of the Revised Penal Code.

Doctrine:

The case underscores the application of Article 12 on insanity and imbecility requiring complete deprivation of intelligence or will, and Article 13(9), recognizing impaired mental faculties as mitigating, but not exempting from criminal liability. Also highlighted is the irreversible imposition of single indivisible penalties despite mitigating factors per Article 63.

Class Notes:

- Imbecility requires complete deprivation of intelligence as an exemption.
- Mitigating circumstances (Article 13(9)): Illness impairing will power without loss of act consciousness.
- Alcohol intoxication: Requires proof of impactful consumption not for crime facilitation.

Historical Background:

This case highlights evolving judicial attitudes towards defenses based on mental health and intoxication in the context of criminal liability, reflecting Philippine legal standards regarding cognitive impairment in criminal proceedings and the unchanged rule on malice and intent in crimes of violence.