

Title: People of the Philippines v. Vicente Antonio and Manuel Antonio - Case Brief

Facts:

On December 26, 1989, at around 8:00 PM, Edgardo Hernandez was attacked in Sitio Alindayo, Almaguer North, Bambang, Nueva Vizcaya by the accused Vicente Antonio, Manuel Antonio, and Romeo Antonio, along with T/Sgt. Wilfredo Bala. Zacarias Hernandez, a witness, testified that while walking home with Edgardo, they heard a gunshot. Upon looking back, they saw T/Sgt. Bala aiming a rifle at them. Fearing for his life, Zacarias fled when three of the accused threw stones at him, hitting him on the head.

Another witness, Rosalinda Reyes, stated that upon hearing the gunshot, she ran outside and saw Manuel and Romeo taking turns boxing and kicking Edgardo while Vicente strangled him. Edgardo pleaded, "I will not fight you, Manong Enteng," referring to Vicente Antonio, but the assault continued. Feliciano Napao, another witness, corroborated seeing the accused attacking Edgardo.

Antonio Lucas, a police officer, found Edgardo's lifeless body approximately 15 meters from an electric post near where the attack occurred, with evidence of strangulation. The death certificate listed asphyxia due to strangulation as the cause of death.

Vicente Antonio claimed self-defense, saying Edgardo attacked him with a bolo, which he parried. During their altercation, Vicente claimed to have covered Edgardo's mouth and nose with mud, causing his death. Manuel Antonio offered an alibi, asserting he was home at the time.

Procedural Posture:

The Regional Trial Court of Nueva Vizcaya found the accused guilty of murder, sentencing them to reclusion perpetua and ordering indemnities. Vicente and Manuel appealed this decision, arguing several errors including the credibility of witnesses, the existence of conspiracy, abuse of superior strength, and misappreciation of self-defense and alibi.

Issues:

1. Were the testimonies of Zacarias Hernandez, Rosalinda Reyes, and Feliciano Napao credible?
2. Was there a conspiracy among the accused to kill Edgardo Hernandez?
3. Did the accused take advantage of superior strength to qualify the crime to murder?
4. Can Vicente Antonio claim self-defense, and is the alibi of Manuel Antonio credible?
5. Should Vicente Antonio benefit from the mitigating circumstance of voluntary surrender?

Court's Decision:

1. **Credibility of Witnesses:** The Supreme Court upheld the trial court's decision that the witnesses were credible. Their positive identification of the accused, absent any ill motive, was compelling.
2. **Conspiracy:** The Court found sufficient evidence of conspiracy. While Vicente strangled Hernandez, Manuel and Romeo physically assaulted him, and Bala acted as a lookout with a rifle. This demonstrated a common design to kill the victim.
3. **Superior Strength:** The Court agreed with the trial court that the crime was murder, aggravated by the abuse of superior strength, as three able-bodied men attacked one individual.
4. **Self-defense and Alibi:** The Court rejected Vicente Antonio's self-defense claim as he was the aggressor. Manuel's alibi failed as he was positively identified, and his house's proximity to the crime scene did not render it impossible for him to be present.
5. **Voluntary Surrender:** The Court denied Vicente the benefit of voluntary surrender as he did not voluntarily present himself to the authorities and was instead found at Bala's house by the police.

Doctrine:

- Conspiracy is established by the concurrence of minds to commit a crime, demonstrated through collective actions.
- Abuse of superior strength as a qualifying circumstance requires analysis of the relative physical disparity between the accused and the victim, suggesting calculated advantage.

Class Notes:

- **Elements of Murder:** Intent to kill, an act that directly causes death, with any of the qualifying circumstances such as treachery, abuse of superior strength, or premeditation.
- **Self-Defense:** Requires proof of unlawful aggression, reasonable necessity of the means to prevent or repel it, and lack of sufficient provocation by the defender.
- **Alibi:** Requires proof of presence in another place at the time of the offense and the impossibility of presence at the crime scene.

Historical Background:

This case unfolded in a socio-political climate of military involvement in civil life and possibly during a period of political tension in the late 1980s in the Philippines. The

presence of a military officer among the accused highlights the implications of military-civilian interactions and the procedural complexities when military personnel are involved in civilian offenses.