

Title: People of the Philippines vs. Estanislao Mangahas, G.R. No. L-11340

Facts:

- Estanislao Mangahas was married to Virginia Coderes on March 22, 1952, and they lived in San Ildefonso, Bulacan.
- On the evening of March 8, 1956, neighbors were drawn to the weeping sounds coming from their house. Upon investigation, they found Mangahas sitting beside the dead body of Coderes, both he and their baby were crying.
- Mangahas told the barrio lieutenant that he left the house and returned to find Coderes hanging from a beam. The assistant barrio lieutenant found the rope tied to the beam and the end appeared to have been cut.
- Mangahas initially claimed his wife had committed suicide. However, upon post-mortem examination, findings showed multiple contusions on Coderes's body and the cause of death was asphyxia due to hanging.
- Mangahas stayed at the municipal building voluntarily to avoid his wife's relatives. On May 14, he confessed to the police that he caused her death because of a fight over attending a town fiesta.
- Mangahas detailed in his confession that he beat his wife following an argument, hit her with a bamboo piece when she retaliated with a bolo, and after she was unconscious, he hanged her to avoid suspicion.
- An information for parricide was filed. During arraignment, Mangahas did not require a lawyer and admitted his guilt, pleading guilty to the charges, and confirmed the voluntary nature of his confession before the justice of the peace.

Issues:

1. Whether Estanislao Mangahas was guilty of parricide.
2. Whether the mitigating circumstances of obfuscation and lack of intent to commit so grave a crime could be applicable.

Court's Decision:

- ****Guilt of Parricide****: The Supreme Court found sufficient evidence to conclude beyond reasonable doubt that Mangahas was guilty of parricide. The post-mortem examination corroborated his confession regarding the beating and the hanging of Virginia Coderes. The contusions could not have been caused by her hanging herself; they supported the claim of a struggle and subsequent unconsciousness followed by hanging.
- ****Mitigating Circumstances****: The trial court recognized two mitigating

circumstances—obfuscation and lack of intent to commit so grave a crime. However, the Supreme Court found that lack of intent was not sufficiently proven; rather, it considered the actions a result of obfuscation alone, deriving from the quarrel.

Doctrine:

The ruling reiterates that:

1. In cases of criminal admission and plea of guilt, especially concerning parricide, confessions corroborated by evidence, such as post-mortem findings and situational evidence, are pivotal in upholding a conviction.
2. Mitigating circumstances must be clear and sufficiently proven to affect sentencing, specifically, the misunderstanding around lack of intent versus impulsive actions under obfuscation.

Class Notes:

- **Parricide**: Defined under Article 246 of the Revised Penal Code in the Philippines, parricide involves the killing of a spouse or relative.
- **Mitigating Circumstances**: As cited, obfuscation and lack of intent are considered; however, these require substantial proof. Obfuscation relates to actions made in the heat of passion under emotional disturbance.
- **Confession**: Must be corroborated by independent evidence, such as external or physical proof, reinforcing the voluntary and truthful nature of admissions.

Historical Background:

This case occurs during a period when societal norms heavily impacted judicial perceptions of familial and spousal conflicts. The case is indicative of a transitional legal era focusing on corroborating physical evidence with confessions while reassessing traditional defenses in spousal murder allegations.