

Title: Lucy Ramos vs. Court of Appeals and People of the Philippines

Facts:

1. The incidents involved Lucy Ramos, her husband Clemente Ramos, and the Fundador brothers, particularly Acciles Fundador. The Ramos family resided in the mountains of Pakuan, Dumaguete, with their nearest neighbors being the Fundadors.
2. On December 1, 1966, Clemente Ramos left to fetch a mechanic for their rice mill repairs, while Lucy went to work at another rice mill in Dumaguete. Meanwhile, Acciles, described as an ex-convict, reportedly harassed the Ramos family home with some drunken companions.
3. On Clemente's return, he found his home attacked by Acciles and Wilson Fundador, leading to Clemente being physically assaulted.
4. Lucy Ramos returned home in the evening, learned of the attack on her husband, and witnessed further harassment by the Fundadors throughout the night.
5. The following day, Acciles was shot in the chest while allegedly provoking and challenging Clemente Ramos outside his home. The bullet was fired from the Ramoses' balcony.
6. Acciles initially named Clemente as his assailant in a police statement but later accused Lucy of the shooting during the trial.
7. On December 6, 1966, a complaint for frustrated murder was filed against both Clemente and Lucy Ramos. By February 1968, an Information for frustrated murder against both was formalized.
8. At trial, conflicting testimonies were presented: the prosecution had Acciles Fundador and Graciano Esler; the defense argued that the houseboy, Venancio Estrabella, might have fired the gun, influenced by Clemente Ramos.
9. The trial court dismissed the charges against Clemente due to insufficient evidence but convicted Lucy Ramos of frustrated murder, considering a mitigating circumstance of immediate vindication of grave offense.
10. The Court of Appeals affirmed the trial court's decision against Lucy Ramos. Upon

denial of a reconsideration, Lucy appealed to the Supreme Court.

Issues:

1. Whether Lucy Ramos was guilty of the crime of frustrated murder beyond reasonable doubt.
2. Whether the testimonies presented by the prosecution were credible enough to warrant a conviction.
3. Whether the mitigating circumstance of immediate vindication of a grave offense was properly applied to the petitioner.

Court's Decision:

1. The Supreme Court reversed and set aside the conviction by the lower court and the Court of Appeals, acquitting Lucy Ramos of the charge due to insufficient evidence proving her guilt beyond a reasonable doubt.
2. The Court found the testimonies, particularly Acciles's shifting statements, lacking credibility. His initial identification of Clemente, followed by the subsequent accusation against Lucy, were inconsistent and unreliable.
3. The doctrine of *falsus in uno, falsus in omnibus* was applied, casting doubt on Acciles's entire testimony.
4. The mitigating circumstance was irrelevant due to the innocence verdict.

Doctrine:

The doctrine of *falsus in uno, falsus in omnibus* was applied. Acciles Fundador's inconsistent testimony was a primary basis for questioning his credibility and led to the acquittal of Lucy Ramos due to reasonable doubt.

Class Notes:

- Elements of Frustrated Murder: The requisite intent to kill, acts of execution (shot fired), and failure to cause death due to reasons independent from the assailant's will.
- Doctrine of Reasonable Doubt: Guilt must be proven beyond a reasonable doubt for conviction, emphasizing reliable witness credibility.

Historical Background:

At the time of this case, the Philippines was dealing with complexities in judicial processes amid recently established martial rule (1965 under Ferdinand Marcos). The judicial system grappled with the balance between legal enforcement and civil rights, scrutinizing evidence rigorously under episodes of distrust in government and social upheavals. This case highlights the importance of consistent and reliable witness testimonies and substantiated evidence in criminal convictions.