

****Title:**** Rolen Peñaranda vs. People of the Philippines

****Facts:****

On June 5, 2005, in Meycauayan, Bulacan, Reynaldo Gutierrez, a tricycle driver, was attacked by a group led by Rolen Peñaranda and others after a prior dispute over alleged overcharging of fares. Earlier, Gutierrez had lodged a complaint against Peñaranda with the barangay. On the day of the attack, Gutierrez was at the tricycle terminal when Ivan Villaranda called Rannie Cecilia, Raul Cecilia, Edwin Celedonia, and Peñaranda. A confrontation ensued where Peñaranda threw a stone at Gutierrez, leading to a physical altercation. Edwin hacked Gutierrez with a “samurai,” causing wounds on his upper arm, and other members of the group hit him with steel pipes. After the attackers fled, Gutierrez sought help and received medical treatment.

The Regional Trial Court (RTC) initially charged Peñaranda and others with frustrated murder on March 9, 2006. During the trial, the prosecution primarily relied on Gutierrez’s testimony, while Peñaranda denied involvement and claimed the incident was fabricated. On May 14, 2012, the RTC convicted Peñaranda of attempted murder, sentencing him to imprisonment and ordering damages.

On appeal, the Court of Appeals (CA), on September 26, 2014, modified the RTC’s decision, affirming Peñaranda’s guilt but reducing the sentence.

****Issues:****

1. Whether Peñaranda is guilty of attempted murder or only physical injuries.
2. Whether the legal requisites of attempted felony were fulfilled.
3. Whether there was intent to kill by Peñaranda and his group.
4. Whether treachery and conspiracy were present in the crime.
5. Proper imposition of penalty and damages.

****Court’s Decision:****

1. ****Guilt for Attempted Murder vs. Physical Injuries:****

- The Supreme Court concluded that Peñaranda was guilty of serious physical injuries rather than attempted murder. The injuries sustained by Gutierrez, while serious, were not proven fatal had medical attention not been rendered. Lack of evidence showing fatality negates the charge of attempted murder in the absence of intent to kill.

2. ****Attempted Felony Requisites:****

- The Court held that the elements of attempted felony were not fully realized, primarily

focusing on the group's spontaneous desistance, which excluded attempted murder from legal purview.

3. **Intent to Kill:**

- The Court determined there was no clear intent to kill demonstrated by their actions during the assault and no continuity to that intent thereafter, as evidenced by Peñaranda and associates ceasing the attack and fleeing.

4. **Treachery and Conspiracy:**

- Treachery was not present as Gutierrez was aware of the potential attack and could defend himself, having a steel pipe at the time of altercation. However, conspiracy was established based on the coordination and concerted acts of the group.

5. **Penalty and Damages:**

- Peñaranda was sentenced to six months of arresto mayor to four years and two months of prision correccional. Damages were reordered, including moral, temperate, and exemplary damages amounting to Php25,000.00, Php10,000.00, and Php50,000.00 respectively, plus interest.

Doctrine:

- For a crime to qualify as attempted murder, there must be clear evidence of fatal intent and lack of external reasons for desisting from carrying out the crime. Spontaneous desistance from completing a felony precludes its classification as attempted but still holds the actor liable for the offense committed up to the point of desistance.

Class Notes:

- **Key Elements:**

- **Serious Physical Injuries (Article 263, RPC):** The inflicted injury causes incapacity or illness for more than 30 days.

- **Intent to Kill:** Must be demonstrated clearly in homicide-related crimes.

- **Desistance in Attempted Felony:** Voluntary cessation exempts from attempted classification.

- **Conspiracy:** Indicates criminal unity of action and intent among perpetrators.

Historical Background:

- This case reflects a recurrent challenge in criminal law where distinguishing between the levels of physical injuries and attempted murder depends significantly on both physiological consequences of the crime and psychological intents of the offenders within calamitous local

disputes.