

Title:

****Robert Taguinod v. People of the Philippines****

Facts:

On May 26, 2002, Pedro Ang (private complainant) and Robert Taguinod (petitioner) were driving in the parking area of Rockwell Powerplant Mall. Ang was driving a Honda CRV from the 3rd basement, and Taguinod was driving a Suzuki Vitara from the 2nd basement. When both reached the payment queue, Taguinod tried to overtake Ang, causing their side view mirrors to touch. Ang's wife and daughter confronted Taguinod but were called back by Ang due to Taguinod's hostile demeanor. Taguinod then accelerated aggressively towards them. Ang decided to take a different lane, paid for parking ahead of Taguinod, but as they exited, Taguinod's Vitara bumped the CRV's rear, pushing it into a stainless steel railing.

As a result of the collision, the CRV needed repairs costing P57,464.66, mostly covered by insurance except P18,191.66 paid by Ang. The Vitara also had minor damage.

An Information was filed against Taguinod in the Metropolitan Trial Court (MeTC) of Makati City for Malicious Mischief under Article 327 of the Revised Penal Code (RPC).

Procedural Posture:

1. ****MeTC Trial and Decision****: Taguinod pleaded not guilty. The prosecution presented Ang's testimony, while the defense called Mary Susan Lim Taguinod and others. On November 8, 2006, MeTC found Taguinod guilty and sentenced him to four months imprisonment plus the payment of damages.
2. ****RTC Appeal****: Taguinod appealed to the Regional Trial Court (RTC) of Makati City, which affirmed the MeTC's decision on September 6, 2007.
3. ****CA Petition****: Undeterred, Taguinod filed a petition for review with the Court of Appeals (CA), which partly granted the petition on September 8, 2008, reducing the imprisonment to 30 days, moral damages to P20,000, and attorney's fees to P10,000.
4. ****Supreme Court Petition****: Taguinod petitioned the Supreme Court for relief, arguing the credibility of witnesses, accuracy of evidence, and awards for damages and attorney's fees.

Issues:

1. ****Factual Findings on Credibility and Evidence****: Did the CA err in upholding the MeTC and RTC findings regarding the credibility of witnesses and weight of evidence?

2. **Elements of Malicious Mischief**: Did the evidence substantiate the elements of Malicious Mischief under Article 327 of the RPC?
3. **Award of Moral Damages and Attorney's Fees**: Was the award of P20,000 in moral damages and P10,000 in attorney's fees warranted?

Court's Decision:

The Supreme Court partially granted and partially denied the relief sought by Taguinod.

1. **Factual Findings on Credibility and Evidence**:

- The Supreme Court upheld the factual findings of the lower courts. The trial court had the best opportunity to observe the demeanor of the witnesses. The discrepancies in Mary Susan Lim Taguinod's testimony undermined her credibility, supporting the trial court's findings.

2. **Elements of Malicious Mischief**:

- The Court affirmed that the elements of Malicious Mischief were met. Taguinod deliberately caused damage to Ang's property, motivated by malicious intent after a minor altercation involving their vehicles. The deliberate act did not fall under arson or other crimes involving destruction but was merely for the sake of causing damage.

3. **Award of Moral Damages and Attorney's Fees**:

- The Supreme Court upheld the award of P20,000 in moral damages, recognizing the emotional and psychological suffering of Pedro Ang and his family stemming from Taguinod's malicious act.
- The Supreme Court, however, found no factual basis for awarding attorney's fees and removed this award.

Doctrine:

- **Credibility and Weight of Evidence**: Factual findings of trial courts regarding the credibility of witnesses are given high respect unless there is a clear misapprehension of facts.
- **Elements of Malicious Mischief**: Deliberate damage to another's property with malicious intent satisfies the elements under Article 327 of the RPC.
- **Moral Damages**: To substantiate moral damages, the claimant must establish an injury caused by the defendant's culpable act, which is the proximate cause of the injury.

Class Notes:

- **Malicious Mischief (Article 327, RPC)**:

1. Deliberate damage to another's property.
 2. Damage not covered under arson or similar laws.
 3. Damage caused out of malice.
- **Moral Damages Requirements** (Article 2217, Civil Code):
1. Injury (physical, mental, or psychological) sustained by the claimant.
 2. Culpable act/omission established.
 3. Proximate causation by defendant's wrongful act.
 4. Justification under Article 2219 or 2220.

Historical Background:

The case highlights the Judiciary's adherence to principles of factual determination by lower courts, emphasizing that consistency and credibility in witness testimonies are paramount. It also underscores the importance of establishing clear factual bases for monetary awards in legal disputes. This case serves as a reference for further understanding the nuances of malice in criminal law and the conditions necessary for moral damages in civil claims, reflective of the dynamics of urban vehicular confrontations in early 2000s Philippines.