

****Title:**** Rosie Quidet vs. People of the Philippines, G.R. No. 23351

****Facts:****

On October 19, 1991, Jimmy Tagarda and his companions, including Andrew Tagarda, were on their way to visit a friend when they encountered Feliciano Taban Jr., Rosie Quidet, and Aurelio Tubo, who had been drinking at Tomas Osep's house. Suddenly, Taban stabbed Andrew with a knife, leading to a brawl. Jimmy attempted to intervene but was stabbed by Taban. As Jimmy lay on the ground, Tubo stabbed him twice, and Quidet punched Jimmy in the mouth. Andrew and Jimmy were taken to the clinic of Dr. Precioso Tacandang, and then to the Northern Mindanao Regional Training Hospital where Jimmy was declared dead. The assailants were charged with homicide and frustrated homicide. Taban pled guilty to homicide while Quidet and Tubo asserted innocence. The Regional Trial Court (RTC) convicted Quidet and Tubo of homicide and all three of frustrated homicide. On appeal, the Court of Appeals (CA) affirmed the RTC decision but modified the charge to attempted homicide for the injuries to Andrew.

****Procedural Posture:****

1. ****RTC Level:**** Taban pled guilty to homicide, while Quidet and Tubo pled not guilty. After a joint trial, Quidet and Tubo were found guilty of homicide and, along with Taban, of frustrated homicide.
2. ****CA Level:**** Quidet appealed. The CA affirmed the RTC's decision with modifications, finding Quidet guilty of attempted homicide and deleting the civil indemnity for Andrew due to lack of substantiation.
3. ****Supreme Court:**** The petition for review was filed by Quidet, challenging the findings of conspiracy and his liability being equated with Taban and Tubo.

****Issues:****

1. Whether the evidence sufficiently proved that Quidet conspired with Taban and Tubo in the commission of homicide and attempted homicide.
2. Whether Quidet's liability should be determined independently based on his actual participation.

****Court's Decision:****

1. ****Existence of Conspiracy:****
 - The Supreme Court ruled that conspiracy was not sufficiently proved. The essential elements of concerted action and unity of purpose were absent.
 - The Court found that Quidet merely acted spontaneously and his actions were neither

necessary nor indispensable in the killing of Jimmy or the stabbing of Andrew.

2. **Liability of Individual Acts:**

- Because there was no conclusive proof of conspiracy, Quidet could only be held liable for his individual acts, specifically, boxing Jimmy and Andrew.
- Consequently, Quidet was found guilty of slight physical injuries for these acts rather than homicide or attempted homicide.

Doctrine:

The capital doctrine reiterated in this case is that conspiracy must be proved beyond a reasonable doubt. Mere association or simultaneous actions do not imply conspiracy unless there is clear evidence of a pre-conceived plan or agreement to commit the crime.

Class Notes:

1. **Conspiracy in Criminal Law:**

- Requires a unity of purpose and action.
- Proof must be beyond a reasonable doubt.
- Inferred from the acts of the accused, but simultaneous actions alone are insufficient.

2. **Revised Penal Code (RPC) Provisions:**

- Article 8 defines conspiracy.
- Article 6 defines frustrated and attempted felonies.
- Article 29 discusses the crediting of preventive imprisonment.

Historical Background:

This case is pivotal within the Filipino legal context for clarifying judicial standards on establishing and proving conspiracy. It reflects the judiciary's cautious approach to protect individuals' rights, specifically the liberty of the accused, by ensuring a stringent standard of proof before ascribing collective responsibility for criminal actions. This case serves as an example of detailed judicial evaluation necessary in distinguishing individual culpabilities from conspiratorial acts amidst violent encounters.