

People of the Philippines vs. Valentin Doquena

Facts

- **Incident**: On November 19, 1938, between 1 and 2 o'clock in the afternoon, a 13-year-old Valentin Doquena was involved in an altercation at the intermediate school in Sual, Pangasinan.

- **Occurrences**:

1. Juan Ragojos and Epifanio Rarang played volleyball in the schoolyard.
2. Doquena intervened by catching and throwing the ball at Ragojos, hitting him in the stomach.
3. Ragojos chased and slapped Doquena on the nape.
4. Doquena assumed a threatening stance, prompting Ragojos to punch Doquena in the mouth.
5. Ragojos returned to playing volleyball.

- **Escalation**:

6. Doquena looked for a stone to retaliate but found none.
7. He approached his cousin, Romualdo Cocal, to borrow a knife.
8. Despite warnings from Rarang, Doquena seized Cocal's knife.
9. Doquena confronted Ragojos, challenging him to hit him again.

- **Tragic Outcome**: In response to Ragojos's refusal and continued play, Doquena stabbed Ragojos in the chest with the knife, leading to Ragojos's death.

Procedural Posture

- **Trial Court Proceedings**:

- The Court of First Instance of Pangasinan found that Doquena acted with discernment when committing the crime, despite being a minor.
- Applied Article 80 of the Revised Penal Code (as amended by Commonwealth Act No. 99), sentencing Doquena to the Training School for Boys until he reached the age of majority.

- **Appeal**:

- Doquena's defense argued the trial court erred in assessing his discernment and in not dismissing the case.
- The defense contended the assessment should include considerations of Doquena's state of mind during the crime.

Issues

1. **Whether the trial court erred in determining that Doquena acted with discernment.**
2. **Whether the trial court should have dismissed the case due to a lack of discernment by**

the minor.**

Court's Decision

- **Discernment Assessment**:
- **Legal Understanding**: Discernment involves the minor's ability to distinguish right from wrong, not premeditation or lack of intention.
- **Factors Considered**: The trial court evaluated Doquena's academic performance, behavior, and testimony. Doquena's rank as one of the brightest students and a cadet corps captain indicated intelligence and awareness.
- **Conclusion**: The trial court properly used all available facts and observations to conclude that Doquena acted with discernment.
- **Case Dismissal**:
- **Defense's Argument**: The defense incorrectly equated discernment with premeditation or lack of intention (mitigating circumstances under Article 13 of the Revised Penal Code).
- **Court's Analysis**: The court emphasized that discernment should be evaluated based on the minor's mental capacity to understand his actions' nature and consequences.
- **Affirmation**: The Supreme Court affirmed the trial court's order, disallowing the dismissal requested by the defense and maintaining the sentence.

Doctrine

- **Discernment of a Minor**:
- **Discernment is assessed by determining a minor's ability to distinguish right from wrong**. This can be evaluated through the minor's behavior before, during, and after the commission of the crime.
- **Discernment is distinct from premeditation or mitigating circumstances**; it is about understanding an act's morality and consequences.

Class Notes

- **Key Elements**:
- 1. **Discernment**: Minor's mental capacity to understand right from wrong in criminal liability.
- 2. **Article 80, Revised Penal Code (as amended by Commonwealth Act No. 99)**: Addresses criminal liability and processing of minors.
- 3. **Article 12, Subsection 3, Revised Penal Code**: Outlines exceptions to criminal liability for minors.
- 4. **Article 13, Revised Penal Code**: Defines mitigating circumstances in criminal cases.
- **Statutes Application**:

- The minor's educational background, behavior, and circumstances during the crime were evaluated.
- Differentiated between understanding right and wrong (discernment) and premeditation/mitigating factors.

Historical Background

- **Context**: At the time this case was decided (1938), there was increasing attention to the treatment of juvenile offenders and their criminal liability. Legal reforms, including Commonwealth Acts adjusting the Revised Penal Code, aimed to better address minor involvement in criminal activities, ensuring proper evaluation of their mental capacity (discernment) separate from adult offenders' considerations.