

Title: People of the Philippines v. Jojit Arpon y Ponferrada

Facts:

In the pre-dawn hours of May 27, 2010, in Barugo, Leyte, Philippines, Rodulfo Moriel and Bernardo Insigne were on their way home after having attended the vespers in Barangay Guindaohan. As they walked, Jojit Arpon, armed with a blade, suddenly assaulted Moriel by stabbing him twice—once on the left chest and again on the right chest—eventually leading to Moriel’s death due to hypovolemic shock from acute blood loss. Arpon was later arrested and during the proceedings, he presented an alibi, claiming he was at the house of Meldy Lucelo with a friend during the time of the incident.

Issues:

The Supreme Court dealt with several issues in this appeal. Firstly, the Court examined the credibility of Bernardo Insigne, the prosecution witness, and whether his testimony was consistent and reliable. Secondly, the Court considered whether the prosecution established the presence of treachery as a qualifying circumstance to categorize the killing as murder. Thirdly, the Court assessed the merit of the defense’s arguments regarding the credibility of the witness and the application of treachery in the commission of the crime.

Court’s Decision:

The Court dismissed the appeal, stating that it had no merit. The testimony of Bernardo Insigne was found to be clear and categorical, positively identifying the accused, Arpon, as the perpetrator. The Supreme Court highlighted that minor inconsistencies in the testimony on collateral matters did not impair the witness’s credibility.

The Supreme Court emphasized that treachery was clearly present, as Arpon had deliberately and unexpectedly attacked the victim, who was unarmed and completely unaware of the assault, fulfilling the condition of treachery as defined under Article 14, paragraph 16 of the Revised Penal Code. The Court rejected the defense’s suggestion that the motive was not established and that the presence of the victim’s friend (Bernardo) during the attack negated treachery. The Court upheld that motive is not an essential element of murder and it need not be proved. Additionally, the Court ruled that the presence of another person (Bernardo) does not preclude the existence of treachery.

Doctrine:

The Court reiterates that treachery is present when the victim is not in a position to defend himself and the offender consciously employs means of attack that ensure the execution

without risk to himself. Furthermore, motive is not an essential element of a crime, including murder, and its absence does not establish innocence. Inconsistencies in testimony that refer to trivial matters do not necessarily impair the credibility of a witness. Delay in the reporting of a crime does not automatically impair witness credibility, especially if a reasonable explanation for the delay is provided.

Historical Background:

In the historical context, this case serves as an affirmation of established jurisprudence on the principles of treachery and witness credibility in Philippine criminal proceedings. The Court applies and adheres to long-standing definitions and doctrines pertaining to criminal elements, witness testimonies, and the appreciation of aggravating circumstances in criminal cases. It also reflects the judiciary's responsibility in ensuring that the factual bases of decisions are grounded in the sufficiency of evidence presented during trial, particularly in establishing guilt beyond reasonable doubt for serious crimes such as murder.