

### Title:

**\*\*People of the Philippines vs. Florenda Manzanilla y De Asis: A Case of Parricide\*\***

### Facts:

Florenda Manzanilla y De Asis, together with Roberto Gacuma y Cabreana, was charged with parricide for the death of her husband, Angel Manzanilla y Saporma, on April 15, 2007, in Antipolo City, Philippines. Roberto died during the course of the trial, leaving Manzanilla as the sole accused.

Prosecution's version depicted eyewitnesses Mark Lawrence Sarmenta and Ajie Bryle Balandres witnessing the accused conspiring and Roberto executing the killing, triggered by Manzanilla's inducement. The defense, conversely, argued Manzanilla's alibi on the night of the murder. Convicted by the Regional Trial Court (RTC) and affirmed by the Court of Appeals (CA), the case was escalated to the Supreme Court of the Philippines under the appeal by Manzanilla.

### Issues:

The legal issues dissected by the Supreme Court included whether Manzanilla's participation was adequately proven to convict her as a principal by inducement in the crime of parricide and whether the findings of conspiracy were correctly applied.

### Court's Decision:

The Supreme Court dismissed Manzanilla's appeal, upholding the CA and RTC's decisions, confirming her guilt beyond a reasonable doubt. The decision meticulously considered the credibility and consistency of the eyewitness testimonies versus Manzanilla's defense of alibi and denial. The Court found the testimonies credible, reinforcing that lack of motive to lie adds credibility to witnesses. Additionally, the Supreme Court agreed on the presence of conspiracy among Manzanilla, Roberto, and an unidentified individual, reinforcing that in the context of parricide, the nature of participation is irrelevant when conspiracy is established.

### Doctrine:

The ruling underscored the doctrine of conspiracy where the act of one becomes the act of all, highlighting that principals by inducement effectively share equal culpability with those executing the criminal acts, provided there's clear inducement leading to the crime's commission.

### Class Notes:

1. **Parricide (Revised Penal Code, Article 246)**: Killing one's spouse, among other familial relations, punishable by reclusion perpetua to death.
2. **Principal by Inducement**: One who, without being present at the crime scene, directly compels another to commit the crime through gifts, promises, or commands.
3. **Conspiracy Doctrine**: When two or more persons aim for a common goal toward committing a crime, each doing their part, they are deemed conspirators, sharing equal guilt.
4. **Alibi and Denial**: Weak defenses against positive identification and credible eyewitness testimony.
5. **Eyewitness Credibility**: Contextual consistency and lack of ill motive enhance credibility.

### ### Historical Background:

This case exemplifies the judicial process in the Philippines, from trial to the Supreme Court's appeal, illustrating the rigorous evaluation evidence undergoes, especially in severe crimes like parricide. It reiterates the principles guiding the adjudication of conspiracy and the role of inducement in criminal liability, fitting within the broader context of Philippine jurisprudence's handling of family-related crimes and the value placed on direct testimony.