

### Title: People of the Philippines v. Ronilee Casabuena y Francisco and Kevin Formaran y Gilera

### Facts:

On October 11, 2012, in Marikina City, Philippines, a robbery with homicide occurred involving accused-appellants Ronilee Casabuena y Francisco and Kevin Formaran y Gilera, along with another conspirator, Jimmy Arizala. The incident took place inside a passenger jeepney where the accused, armed with a gun and bladed weapons, declared a hold-up and robbed the passengers. During the ensuing chaos, as the police responded to the incident, a scuffle over a gun between Arizala and PO2 Ramilo De Pedro resulted in Arizala's death.

A detailed procedural posture began with the arraignment where the appellants pled not guilty. The trial court found the appellants guilty of robbery with homicide and sentenced them to reclusion perpetua. Subsequently, the appellants appealed to the Court of Appeals, which affirmed the trial court's decision. The appellants then sought relief from the Supreme Court, insisting on their innocence and challenging the findings of both lower courts.

### Issues:

1. Whether the accused-appellants committed the complex crime of robbery with homicide under Article 294, paragraph 1 of the Revised Penal Code.
2. Whether there was a direct relation and intimate connection between the robbery and the killing.
3. Whether conspiracy among the accused-appellants and Jimmy Arizala was duly proven.

### Court's Decision:

The Supreme Court dismissed the appeal and affirmed the Court of Appeals' decision. The Court held that the elements for the complex crime of robbery with homicide were satisfied: the personal properties were taken with violence or intimidation, the properties belonged to another, the taking was with intent to gain, and a homicide occurred by reason or on the occasion of the robbery. The court affirmed that for robbery with homicide, the law requires the homicide be committed "by reason" or "on occasion" of the robbery, regardless of whether the homicide was committed before, during, or after the robbery, and irrespective of the identity of the victim. Moreover, the court ruled that conspiracy was sufficiently proven based on the collective actions of the accused-appellants and Jimmy Arizala, who aided each other in the robbery and ultimately led to a homicide.

### ### Doctrine:

The Supreme Court reiterated the doctrine that in the crime of robbery with homicide, it is irrelevant who the victim of the homicide is (whether one of the robbers, a bystander, or a passenger) as long as it was committed “by reason or on occasion” of the robbery. The law does not distinguish between the perpetrators or the victims in such cases; therefore, courts should not distinguish either.

### ### Class Notes:

- **Complex Crime of Robbery with Homicide**: Occurs when a homicide (regardless of the victim) is committed either by reason or on the occasion of the robbery.
- **Elements**: (1) Taking of personal property with violence or intimidation; (2) Property belongs to another; (3) Intent to gain; (4) Homicide occurs by reason or on the occasion of the robbery.
- **Conspiracy**: When two or more persons come to an agreement concerning the commission of a felony and decide to commit it. It may be deduced from the conduct of the accused indicating a common understanding related to the commission of the crime.
- **Article 294, Paragraph 1, Revised Penal Code**: Defines the penalties for robbery with violence or intimidation, specifying the condition under which homicide committed during a robbery elevates the crime to a complex crime of robbery with homicide.

### ### Historical Background:

The decision in “People of the Philippines v. Ronilee Casabuena y Francisco and Kevin Formaran y Gilera” serves as a reiteration of the principles surrounding the complex crime of robbery with homicide under Philippine law. It emphasizes the broad interpretation of “by reason or on occasion” of the robbery to include any homicide connected to the act of robbery, reflecting the legislative intent to severely penalize the combination of theft and murder regardless of the sequence or specifics of the fatal act.