

**\*\*Title:\*\*** People of the Philippines v. Ignacio Cupino and Vincent Dejoras

**\*\*Facts:\*\***

The case originated from an Information filed on October 19, 1989, by the Fourth Assistant City Fiscal of Cagayan de Oro City, Philippines, against Ignacio Cupino, Vincent Dejoras, and Ramon Galos for the crime of robbery with murder committed on August 16, 1989, at about 9:45 PM at Patag Crossing, Cagayan de Oro City. It was alleged that the three, conspiring together, armed with a knife, killed Gromyko Valliente.

During the arraignment on January 22, 1990, both Cupino and Dejoras pleaded not guilty. After the trial, the Regional Trial Court (RTC) of Cagayan de Oro City pronounced them guilty of murder, qualified by treachery, and sentenced them to reclusion perpetua.

**\*\*Procedural Posture:\*\***

The appeal reached the Supreme Court due to the gravity of the imposed sentence. The appellants sought to overturn the RTC decision, arguing against the credibility of prosecution witnesses, the establishment of conspiracy, and the finding of their guilt.

**\*\*Issues:\*\***

1. Whether the RTC erred in its assessment of the credibility of prosecution witnesses.
2. Whether there was a conspiracy between the accused.
3. Whether the accused-appellants were rightly convicted.

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

The Supreme Court affirmed the RTC's decision regarding Ignacio Cupino but reversed it concerning Vincent Dejoras. The Court found no material inconsistency in the testimonies of prosecution witnesses and upheld their credibility. However, it found a lack of sufficient evidence to prove beyond reasonable doubt that Vincent Dejoras conspired with the other accused to commit the murder.

**\*\*Doctrine:\*\***

The Supreme Court reiterated that conspiracy needs to be proven beyond a reasonable doubt, and the participation of each conspirator must be established to hold them liable. Furthermore, it cemented the principle that the evidence required to convict must surpass the threshold of moral certainty.

**\*\*Class Notes:\*\***

- Conspiracy in criminal law must be proven with the same level of certainty as the crime

itself.

- The participation of each individual in a group crime must be clearly established.
- The credibility of witnesses is a critical factor in the trial process, and appeals courts generally defer to the trial court's assessment unless glaring inconsistencies or mistakes are evident.
- Treachery can qualify a killing as murder, indicating a deliberate choice of means to ensure execution without risk to the assailant.

**\*\*Historical Background:\*\***

This case highlights the complexities involved in cases with multiple defendants and the challenges of proving conspiracy and individual culpability. The appeal underscores the appellate court's role in scrutinizing trial court decisions, especially in grave offenses requiring the imposition of severe penalties like reclusion perpetua. It also emphasizes the Philippine legal system's adherence to the principle that guilt must be proven beyond a reasonable doubt.