

Title:

People of the Philippines vs. Salvador Arrojado: A Case of Murder within the Family

Facts:

Salvador Arrojado was convicted by the Regional Trial Court (RTC) of Roxas City for the murder of his cousin, Mary Ann Arrojado, sentencing him to reclusion perpetua and ordering him to pay damages. On June 1, 1996, Salvador reported Mary Ann's alleged suicide to a cousin, leading to the discovery of Mary Ann's body with multiple stab wounds. No signs of forced entry were observed, and the murder weapon, a kitchen knife, was found near the victim. Salvador lived with the victim and her father, working as a caregiver. The prosecution established a motive, suggesting Salvador was driven by resentment over her alleged verbal abuses. The defense argued it was a suicide, noting discrepancies in the observed wounds and positing that post-mortem wounds might have been inflicted. The RTC found sufficient circumstantial evidence to convict Salvador of murder, highlighting his motive, opportunity, and the impossibility of suicide given the nature of the wounds.

Issues:

1. Whether the victim, Mary Ann Arrojado, committed suicide or was murdered.
2. The credibility of Salvador Arrojado's defense claiming the victim's suicide.
3. The possibility of an outsider entering the house to commit the crime.
4. The court's assessment of the motive and opportunity for Salvador to commit the murder.
5. Whether the qualifying circumstance of treachery was properly considered.
6. The application of the doctrine of circumstantial evidence in convicting the accused.
7. The correct imposition of penalties and damages.

Court's Decision:

The Supreme Court affirmed the RTC's decision with modification regarding penalties and damages, convicting Salvador Arrojado for the murder of Mary Ann Arrojado based on circumstantial evidence. It ruled out suicide based on the nature and number of wounds, which indicated a deliberate and treacherous attack. The inconsistencies in the suicide theory presented by the defense were dismissed, and the court found no merit in the claims regarding potential external perpetrators due to the security of the house. The Court further noted the strained relationship between the victim and the accused, substantiating the motive. With regard to treachery, the Court deemed it correctly considered as the method of execution ensured defenselessness on the victim's part. Regarding penalties, it corrected the duration of reclusion perpetua to its full extent without specifying 30 years, adjusting civil indemnity and moral damages to P50,000.00 each.

Doctrine:

The Court reiterated the application of circumstantial evidence in criminal convictions, where a combination of circumstances—each proven beyond reasonable doubt—can suffice for conviction if they lead to a moral certainty of the accused’s guilt. It also clarified the definition and application of treachery as a qualifying circumstance in murder cases.

Class Notes:

- Circumstantial Evidence: Requires more than one circumstance; facts from which inferences are derived are proven; and the combination of all circumstances leads to a conviction beyond reasonable doubt.
- Treachery: Requires means of execution that give the person attacked no opportunity to defend themselves and such means were deliberately or consciously adopted.
- Penal Impositions: Reclusion perpetua is indivisible, and its duration does not specify a number of years (*People v. Lucas*). Adjustments to indemnity and damages awards follow recent jurisprudence.

Historical Background:

This case occurs against the backdrop of evolving penal laws in the Philippines, particularly with the amendments under Republic Act No. 7659, which affected the penalties related to heinous crimes such as murder. It also reflects on the procedural requirements under the Revised Rules of Criminal Procedure effective from December 1, 2000, mandating the specification of qualifying and aggravating circumstances in criminal informations.