

Title:

People of the Philippines vs. Chito Nazareno: A Ruling on Conspiracy and Abuse of Superior Strength in Murder

Facts:

This case revolves around the murder of David Valdez (David) where Chito Nazareno and Fernando Saliendra were charged before the Regional Trial Court (RTC) of Manila in Criminal Case 94-133117. Since Saliendra remained at large, only Nazareno stood trial.

The events leading to the murder began on November 10, 1993, during a wake attended by David, Roy Magallanes, Roger Francisco, alongside the accused Nazareno and Saliendra. A dispute broke out between Magallanes and Nazareno but was quickly quelled by their companions. The next day, despite a brief reconciliation, Nazareno and Saliendra blocked David and his companions as they walked along the street. A violent altercation ensued, leading to David being assaulted with a stick by Nazareno and a stone by Saliendra, and ultimately, the aid of barangay tanods in beating David, resulting in his death due to a massive intra-cranial hemorrhage.

The authorities initiated an investigation following reports from David's relatives, leading to Nazareno's arrest. He defended himself by claiming an alibi, stating he was merely buying milk during the incident, a claim corroborated by his wife but not supported by evidence from the crime scene and witnesses.

After deliberation, the RTC found Nazareno guilty of murder, with the decision later affirmed by the Court of Appeals (CA), albeit qualifying the murder by abuse of superior strength due to the absence of treachery.

Issues:

1. Whether Nazareno participated in a conspiracy to murder David.
2. Whether the murder was qualified by an abuse of superior strength.

Court's Decision:

1. **Conspiracy**: The Court upheld the findings of both the RTC and the CA, affirming that Nazareno and Saliendra exhibited a concerted effort indicating a conspiracy to commit murder. The testimonies of witnesses and the sequence of the events, emphasizing their joint actions against David, substantiated the existence of a conspiracy.
2. **Abuse of Superior Strength**: The Court agreed with the CA's qualification of the crime

due to abuse of superior strength. Nazareno and Saliendra, armed and with the aid of barangay tanods, overwhelmingly overpowered unarmed David, exploiting their superior strength to ensure he could not defend himself.

Consequently, Nazareno's conviction for murder, subject to the qualifying circumstance of abuse of superior strength, was affirmed. The original decision was modified only in terms of the damages awarded.

Doctrine:

The Court reiterated the principle that in cases of conspiracy, the act of one conspirator is deemed the act of all, reinforcing the notion that collective action aimed at committing a felony binds each participant to the outcome. Furthermore, it clarified the applicability of abuse of superior strength as a qualifying circumstance in murder when assailants employ disproportionate force against the victim, rendering the latter defenseless.

Class Notes:

1. **Conspiracy in Criminal Law**: The existence of a conspiracy can be inferred from the conduct demonstrating a common purpose or plan among the perpetrators.
2. **Abuse of Superior Strength**: This qualifying circumstance in murder cases pertains to the deliberate use of overwhelming force or advantage by the perpetrator(s) against the victim, making it substantially impossible for the victim to defend themselves.
3. **Murder Qualified by Circumstances**: For a killing to be categorized as murder, qualifying circumstances such as treachery, abuse of superior strength, or others must be proven to elevate the crime from homicide.
4. **Legal Defense of Alibi**: The defense of alibi requires proving the physical impossibility of the accused's presence at the crime scene, deemed the weakest form of defense due to its susceptibility to fabrication.

Historical Background:

This case reflects the judicial process's handling of violent crimes, showcasing the Philippine legal system's approach to assessing evidence, witness testimonies, and established legal precedents to adjudicate cases of severe criminal conduct.