

****Title:**** Aurora Engson Fransdilla vs. People of the Philippines

****Facts:****

The case arose from a robbery incident on February 20, 1991, at around 3 to 4 PM at No. 24, Mabait St., Teachers Village, Quezon City. Aurora Engson Fransdilla, along with four men, entered the house of Lalaine Yreverre under the pretense of being from the Philippine Overseas Employment Agency (POEA). Inside, they committed robbery, using violence and intimidation against Lalaine Yreverre and other household members. The robbers took numerous items, including jewelry and cash, totaling over PhP2.7 million. After the robbery, intensive police and investigative efforts led to the identification and apprehension of Fransdilla and her co-accused through various means, such as lineup identifications, intelligence operations, and confessions.

****Procedural Posture**:**

Fransdilla and her co-accused were charged with robbery under Article 299 of the Revised Penal Code. The Regional Trial Court (RTC) convicted them, imposing a penalty of 12 years and 1 day to 20 years of reclusion temporal and ordering them to pay damages. The Court of Appeals (CA) affirmed the RTC's decision with a modification to the imposed penalties. Fransdilla appealed to the Supreme Court, insisting on her innocence and arguing against the sufficiency of evidence for conspiracy.

****Issues:****

1. Whether the prosecution successfully established Fransdilla's guilt beyond reasonable doubt as a conspirator in the robbery.
2. Whether the crime committed was the complex crime of robbery under Article 299 and 294 of the Revised Penal Code.
3. Whether the imposition of the Indeterminate Sentence Law was appropriate.
4. The appropriateness of the awarded damages and interests.

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

1. The Supreme Court affirmed the CA's decision, holding Fransdilla and her co-accused guilty beyond reasonable doubt for the charged robbery. The Court identified her as an active participant through her overt acts that facilitated the crime, establishing conspiracy.
2. It was held that the crime committed was correctly identified as the complex crime of robbery in an inhabited house by armed men and robbery with violence against or intimidation of persons, warranting the imposition of the penalty for the more serious crime in its maximum period.

3. The Supreme Court corrected the indeterminate sentence to conform to the Indeterminate Sentence Law, setting it at 12 years of prision mayor as a minimum to 17 years, four months, and one day of reclusion temporal as a maximum.

4. The award of exemplary damages was deleted due to a lack of an aggravating circumstance, but the actual damage of PhP2,250,000.00 was upheld with an interest of 6% per annum from the filing of the information until full payment.

****Doctrine:****

The essence of conspiracy lies in the unity of criminal intent and purpose and the joint act by the accused leading to the perpetration of the criminal intent. Once conspiracy is established, the act of one is deemed the act of all.

****Class Notes:****

- Conspiracy requires a common design and purpose among the conspirators, evidenced by their concerted actions leading to the unlawful act.
- The complex crime doctrine establishes that when two crimes are inseparable in their commission, the penalty for the more severe crime applies.
- Under the Indeterminate Sentence Law, the court imposes a sentence that has a maximum and a minimum period to facilitate rehabilitation and eventual reintegration into society.
- Exemplary damages require the presence of an aggravating circumstance in criminal cases.

****Historical Background:****

The case reflects the application of complex crime and conspiracy doctrines in Philippine criminal law, underscoring the importance of establishing a coherent narrative from the facts to affirm the unity of purpose among co-accused in the commission of a crime. It further illustrates the meticulous process of crime investigation and the significance of evidence handling and witness testimony in achieving a conviction.