

****Title:**** *People of the Philippines v. Reynaldo Barde*

****Facts:**** On April 15, 1999, in Sitio Santo Niño, Barangay Liguán, Municipality of Rapu-Rapu, Province of Albay, Reynaldo Barde detonated a hand grenade (M26-A1 Fragmentation grenade) at a dance held in connection with a feast day celebration. The explosion resulted in the deaths of fifteen individuals and wounded at least seventy-six others. Reynaldo Barde and his brother, Jimmy Barde, were charged with the complex crime of multiple murder with multiple frustrated murder under an Information dated August 13, 1999. Upon arraignment, both accused, assisted by counsel de officio, entered a plea of not guilty.

During the trial, the prosecution presented witnesses Elmer Oloroso, Antonio Barcelona, Alexander Basallote, Nilda Yasol, and SPO2 Hipolito Talagtag, among others, to establish the facts surrounding the case. The defense, on the other hand, depended on Reynaldo Barde's denial and alibi, corroborated by witnesses including his family members and radio broadcaster Wilfredo Echague. The Regional Trial Court (RTC) of Legazpi City found Reynaldo Barde guilty of the complex crime and acquitted Jimmy Barde for lack of evidence.

Reynaldo Barde appealed to the Court of Appeals, which affirmed the RTC's decision with modifications, specifically on the penalties and damages awarded. The case was further escalated to the Supreme Court under CA-G.R. CR-H.C. No. 01245.

****Issues:****

1. Whether the guilt of Reynaldo Barde for the crime charged was proven beyond reasonable doubt.
2. Whether the identification of Reynaldo Barde as the perpetrator was credible.
3. Whether Reynaldo Barde's defense of denial and alibi was tenable.
4. The correct classification of the crime committed and the appropriate penalties.

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

The Supreme Court affirmed the appellate court's decision with modifications. It held Reynaldo Barde guilty of the complex crime of multiple murder with double attempted murder, considering the actual consequences of his act of detonating an explosive device. The Court emphasized the credibility of eyewitness accounts over Barde's defenses of denial and alibi. The penalties and damages awarded were adjusted in accordance with applicable laws and jurisprudence.

****Doctrine:****

1. Positive identification, where credible and reliable, prevails over the defenses of denial

and alibi.

2. The complex crime of multiple murder with attempted murder is committed when a single illicit act results in multiple deaths and injuries, with the intent to kill.

****Class Notes:****

- ****Positive Identification vs. Denial and Alibi:**** Credible eyewitness testimony outweighs denial and alibi unless the latter is corroborated by clear and convincing evidence showing that it was physically impossible for the accused to be at the scene of the crime.
- ****Complex Crime Under Article 48:**** When a single act constitutes two or more grave felonies, the penalty for the most serious crime, applied in its maximum period, shall be imposed.
- ****Treachery as an Aggravating Circumstance:**** Treachery exists when the method of execution adopted ensures the execution of the crime without risk to the perpetrator from any defensive or retaliatory act on the part of the victim.
- ****Damages:**** Standard damages in cases of murder include civil indemnity, moral damages, and exemplary damages, subject to adjustments based on jurisprudence and specific circumstances.

****Historical Background:****

The incident took place within the context of local festivities, demonstrating the violation of communal peace and the serious consequences of using explosives in committing a crime. The legal journey of this case underscores the Philippine judicial system's approach to crimes involving mass casualties and the principles guiding the assessment of evidence and witness credibility.