

****Title:**** Rolito Rabanal vs. People of the Philippines and Hon. Court of Appeals

****Facts:**** On November 16, 1986, in Quezon City, Philippines, Rolito Rabanal, Salvador Impistan alias “Ador”, and Eloy Labatique were accused of killing Felipe Sales y Nachor with bladed weapons, resulting in multiple stab wounds and eventually leading to Sales’ death. The case was tried at the Regional Trial Court (RTC) of Quezon City, Branch 97. During the trial, the prosecution’s evidence largely hinged on the testimony of the lone eyewitness, Dionisio Javier, who identified Rabanal and the co-accused as the assailants. Javier described the sequence of events leading to Sales’ death in careful detail, implicating Rabanal in the crime. In contrast, the defense presented Rabanal and Raymundo Buenaventura, who argued Rabanal’s alibi and questioned the consistency of Javier’s testimony. Despite Javier’s inconsistencies, the RTC found Rabanal guilty of homicide, sentenced him to imprisonment, and ordered him to pay indemnities. Rabanal appealed to the Court of Appeals, which affirmed the trial court’s decision. Dissatisfied, Rabanal sought recourse from the Supreme Court via a petition for certiorari under Rule 45 of the Rules of Court.

****Issues:****

1. Whether the testimony of the lone eyewitness, Dionisio Javier, was credible and reliable enough to support Rabanal’s conviction for homicide.
2. Whether the discrepancies and inconsistencies in Javier’s testimonies affected his credibility and the outcome of the case.
3. Whether the physical evidence, particularly the autopsy report detailing the victim’s injuries, corroborated or contradicted Javier’s account of the events.
4. Whether Rabanal’s guilt was proven beyond a reasonable doubt based on the evidence presented in court.

****Court’s Decision:**** The Supreme Court closely examined Javier’s testimony, his previous inconsistent statements, and the autopsy report of the victim’s injuries. Considering the significant discrepancies and inconsistencies in Javier’s testimonies, and the fact that the autopsy report did not confirm his account of where and how Rabanal allegedly stabbed the victim, the Court found that Javier’s identification of Rabanal as one of the assailants was doubtful, inconclusive, and unreliable. These findings raised a reasonable doubt regarding Rabanal’s participation in the crime. Given that in criminal cases, guilt must be proven beyond a reasonable doubt, and based on the principle of presumption of innocence, the Supreme Court found Rabanal’s conviction to be unfounded. Consequently, the Court reversed the decision of the Court of Appeals and ordered Rabanal’s immediate release

unless held for another lawful cause.

****Doctrine:**** In criminal cases, the conviction of the accused must be based on proof beyond reasonable doubt. The testimony of a lone witness must be credible, reliable, and corroborated by physical evidence, if available, to support a conviction. Inconsistencies and discrepancies in witness testimonies that are material to the elements of the crime can undermine the credibility of the witness and cast doubt on the guilt of the accused. Moreover, the physical evidence should not contradict the testimonial evidence. When reasonable doubt exists, the presumption of innocence prevails, and the accused must be acquitted.

****Class Notes:****

1. ****Proof beyond reasonable doubt**** - The standard required for conviction in criminal cases. It implies moral certainty of the guilt of the accused.
2. ****Inconsistencies in testimonies**** - Minor inconsistencies that do not affect the material points of the witness's testimony do not necessarily discredit the witness. However, significant discrepancies that go to the essence of the crime can cast doubt on the witness's credibility and the guilt of the accused.
3. ****Physical evidence vs. testimonial evidence**** - Physical evidence is considered to have greater probative value than testimonial evidence. Where physical evidence contradicts testimonial evidence, the former is generally given more weight.
4. ****Presumption of innocence**** - A fundamental principle of criminal law that every person is presumed innocent until proven guilty.

****Historical Background:**** This case highlights the Philippine legal system's approach to handling criminal cases involving serious crimes such as homicide. It showcases the reliance on eye-witness testimonies, the challenges associated with inconsistencies in witness accounts, and the integral role of physical evidence. Furthermore, it underscores the judiciary's responsibility to scrutinize evidence thoroughly to protect the rights of the accused, particularly the presumption of innocence and the requirement of proof beyond reasonable doubt.