

Title: People of the Philippines vs. Benjamin Galano Y Gloria, et al.

Facts:

This case arose from a tragic incident on September 8, 1990, in Sampaloc, Manila, wherein Benjamin Galano, Brigido Tripoli, and Romulo Sta. Iglesia were implicated in the murder of Leonardo Torres and the attempted murder of his brother, Virgilio Torres. On that evening, as the Torres brothers were waiting for a ride at a street corner, they responded to a commotion caused by a snatching incident. Benjamin, armed with a knife, emerged from a jeepney and, along with Brigido and Romulo, who restrained the victims, stabbed both brothers, resulting in Leonardo's death and serious injuries to Virgilio.

Virgilio was able to note the jeepney's license plate and later identified the assailants in a police lineup. The Manila City Prosecutor subsequently charged Galano, Tripoli, Sta. Iglesia, and Elmer Honorio (who was acquitted) with murder. Throughout the trial, the defense argued alibi which was dismissed by the trial court due to the strength of Virgilio's testimony and the physical evidence. On August 20, 1993, the Regional Trial Court of Manila found the defendants guilty, sentencing them to reclusion perpetua.

Issues:

1. The credibility of the sole eyewitness, Virgilio Torres.
2. The sufficiency of evidence to convict the appellants.
3. The applicability of the defense of alibi.
4. The presence of treachery as a qualifying circumstance.
5. The correctness of the murder categorization and the imposable penalty under the circumstances.

Court's Decision:

The Supreme Court affirmed the decision of the Regional Trial Court.

1. **Credibility of Virgilio Torres:** The Court held that Virgilio's identification of the assailants was credible and reliable despite being the sole eyewitness. Factors such as the illumination provided by a lamp post, the proximity to the assailants, and the absence of any ill motive reinforced his testimony's credibility.
2. **Sufficiency of Evidence:** The Court found the testimony of Virgilio Torres sufficient to establish the guilt of the appellants beyond reasonable doubt, dismissing the relevance of purported inconsistencies highlighted by the defense.

3. **Defense of Alibi:** The Court dismissed the defense of alibi, as the appellants failed to prove the physical impossibility of their presence at the crime scene.
4. **Presence of Treachery:** The Supreme Court agreed that treachery was present, noting that the attack was unexpected, sudden, and made in a manner that ensured no chance for the victims to defend themselves, thus qualifying the killing to murder.
5. **Murder Categorization and Penalty:** Confirming the act as murder due to treachery, the Court maintained the penalty of reclusion perpetua. It also enforced a P50,000 indemnification to the victim's heirs, aligning with jurisprudence.

Doctrine:

The case reiterated the doctrine that the testimony of a single credible and reliable witness can suffice to support a conviction. It also highlighted the legal principle that for treachery to be considered, the method of execution must ensure the assailant's safety from any defensive acts by the victim.

Class Notes:

- **Identification under Adverse Conditions:** Factors contributing to credible identification include sufficient illumination, the witness's emotional state, and their opportunity to observe the assailant.
- **Alibi as a Defense:** Alibi must demonstrate the physical impossibility of presence at the crime scene to be accepted.
- **Treachery (Alevosía):** For treachery to qualify an act to murder, the attacker must employ means that give the victim no opportunity to defend themselves or retaliate.
- **Single Witness Testimony:** The testimony of a single witness, if found positive and credible, is sufficient to convict.
- **Penalty for Murder Pre-RA 7659:** Before the introduction of RA 7659 (Death Penalty Law), the penalty for murder was reclusion temporal in its maximum period to death, with reclusion perpetua being imposed in the absence of qualifying aggravating or mitigating circumstances.

Historical Background:

This case offers insights into the Philippine judicial system's handling of violent crimes, specifically murder, during the early 1990s. It demonstrates the court's reliance on eyewitness testimony, the evaluation of defenses like alibi, and the application of legal principles such as treachery to qualify crimes to murder. Additionally, it underscores the

judiciary's role in adjudicating cases involving sudden and violent street crimes, reflecting societal concerns and legal challenges of the period.