

**\*\*Title:\*\*** Mel Carpizo Candelaria vs. The People of the Philippines

**\*\*Facts:\*\***

The case revolves around Mel Carpizo Candelaria, a truck driver employed by Jessielyn Valera Lao, owner of United Oil Petroleum Phils. (Unioil). On August 23, 2006, Candelaria was dispatched to deliver 14,000 liters of diesel fuel worth P497,000 to Viron Transit Corporation but failed to do so. Viron Transit reported the non-delivery, prompting an investigation that revealed the lorry truck used for delivery was found emptied in Laguna without Candelaria's whereabouts. Consequently, Lao filed a complaint for Qualified Theft against Candelaria, backed by testimonies from Lao's mother and a Unioil employee. Candelaria's defense hinged on the absence of direct evidence tying him to the crime, noting that incriminating statements from his now-deceased helper constituted hearsay.

Procedurally, the case advanced from the Regional Trial Court of Manila, which convicted Candelaria of Qualified Theft, to the Court of Appeals (CA), which affirmed the conviction. Candelaria's subsequent motion for reconsideration was denied by the CA, prompting the elevation of the case to the Supreme Court on petition for review on certiorari.

**\*\*Issues:\*\***

1. Whether the CA correctly found Candelaria guilty based on circumstantial evidence.
2. The appropriate valuation of the stolen diesel fuel for purposes of determining the penalty.

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

The Supreme Court denied the petition, upholding the CA's decision. It found the circumstantial evidence sufficient to meet the standard for conviction beyond reasonable doubt. The Court determined that the elements of Qualified Theft were present, emphasizing the abuse of confidence and lack of consent from the owner. It rejected Candelaria's defense of hearsay and highlighted his unaccounted flight as indicative of guilt. Regarding the value of the stolen diesel, the Court took judicial notice of the Department of Energy's published fuel prices, affirming the valuation at P497,000.00. The Court modified the CA's decision regarding penalties, sentencing Candelaria to reclusion perpetua without parole eligibility and confirming the indemnity amount.

**\*\*Doctrine:\*\***

This case reiterates the doctrine that circumstantial evidence can suffice for a conviction if it shows a coherent and consistent narrative pointing to the accused's guilt to the exclusion

of all other hypotheses. Additionally, it emphasizes the judicial practice of discerning the value of stolen property for penalty determination, allowing courts to take judicial notice of public knowledge or unquestionably demonstrable matters, such as official fuel prices.

**\*\*Class Notes:\*\***

1. Circumstantial Evidence: Requires a combination of circumstances that lead to a conviction beyond reasonable doubt, excluding any other hypothesis aside from guilt.
2. Qualified Theft: Elements include taking of personal property, belonging to another, with intent to gain, without the owner's consent, accomplished without violence or intimidation or force upon things, and committed with grave abuse of confidence.
3. Judicial Notice: Courts can recognize certain facts as true without requiring evidence, including matters of public knowledge or capable of unquestionable demonstration.

**\*\*Historical Background:\*\***

This case is significant in the context of legal proceedings involving property crimes in the Philippines, particularly emphasizing the reliance on circumstantial evidence and the valuation of stolen goods. It underscores the courts' latitude in applying judicial notice, especially when determining the value of stolen property for sentencing, reflecting the ongoing effort to adapt legal processes to the realities of economic and market conditions.