

Title: People of the Philippines v. Anecito Unlagada y Suanque a.k.a. "Lapad"

Facts:

On the night of January 27, 1989, Danilo Laurel, accompanied by Edwin Selda, attended a public dance in Hinigaran, Negros Occidental. After taking a break from the dance to drink beer, Laurel was attacked and fatally stabbed by a group of individuals led by Anecito Unlagada a.k.a "Lapad." Edwin Selda, who was with Laurel at the time of the attack, witnessed the stabbing and later identified Unlagada as the assailant at the police station. The defense presented an alibi for Unlagada, claiming he was at the dance hall both before and after the incident. The Lower Court convicted Unlagada of murder, sentencing him to reclusion perpetua and ordering him to pay damages to the victim's heirs. Unlagada appealed, challenging the credibility of the lone eyewitness and the classification of the crime as murder rather than death in a tumultuous affray.

Issues:

1. Whether the testimony of the sole eyewitness, Edwin Selda, was credible and sufficient for conviction.
2. Whether the crime committed was murder or death in a tumultuous affray as defined under Article 251 of the Revised Penal Code.
3. The appropriateness of the damages awarded by the trial court.

Court's Decision:

The Supreme Court affirmed the trial court's decision, holding that:

1. The eyewitness testimony of Edwin Selda was credible and sufficient for conviction. Despite the defense's assertion of the improbability of Selda's clear identification of Unlagada due to the circumstances, the Court found no plausible reason to doubt the witness's account, especially considering his physical proximity to the crime scene.
2. The incident did not constitute a death in a tumultuous affray but was indeed murder qualified by treachery. The attack on Danilo Laurel was sudden and unprovoked, making it impossible for him to defend himself, satisfying the element of treachery.
3. The award of damages was partially modified. The Supreme Court set the civil indemnity and moral damages at P50,000.00 each but eliminated the awards for temperate and exemplary damages due to lack of factual and legal basis.

Doctrine:

The case reiterated the doctrine that the defense of alibi is weak against positive identification by a credible witness. Moreover, it underscored the legal characterization of

what constitutes a “tumultuous affray” and differentiated it from a targeted attack, which is treated as murder when qualified by treachery.

Class Notes:

- **Key Concepts:** Positive Identification, Alibi, Tumultuous Affray, Treachery, Damages
- **Relevant Statutes:**
- **Article 248 of the Revised Penal Code** - Definition and penalty for Murder.
- **Article 251 of the Revised Penal Code** - Definition of Death caused in a tumultuous affray.
- **Application:** The Supreme Court’s decision emphasized the primacy of credible eyewitness testimony over an alibi, especially when the eyewitness had no apparent motive to lie. Furthermore, it illustrates how treachery can qualify an attack as murder and clarifies the conditions under which death in a tumultuous affray can be considered.

Historical Background:

In the context of the Philippine legal system, the distinction between murder and death resulting from a tumultuous affray reflects the intention to identify the specific nature of violent crimes and prescribe appropriate penalties. This case demonstrates the judiciary’s role in interpreting and applying these distinctions based on the evidence presented, ensuring justice is served while adhering to legal definitions and standards.