

Title: People of the Philippines vs. Rael Delfin

Facts:

The case revolves around the murder of Emilio Enriquez, a 51-year-old fisherman from Navotas City, on the night of 27 September 2000. Rael Delfin was suspected of the murder and was charged with murder under Article 248(1) of the Revised Penal Code before the Regional Trial Court (RTC) of Malabon on 13 March 2001. Despite a plea of not guilty, the trial proceeded with testimonies from Joan Cruz, the victim's live-in partner and eyewitness, and Dr. Jose Arnel Marquez, the physician who examined the victim post-mortem, against Delfin. In defense, Delfin and corroborating witness Rene Villanueva presented an alibi of being on a fishing trip at the time of the crime, which was later contradicted by Villanueva's admission regarding their actual return date. On 20 July 2009, the RTC found Delfin guilty beyond reasonable doubt of murder, a decision later affirmed by the Court of Appeals (CA) on 29 April 2012, albeit with modifications in damages awarded.

Issues:

1. Was the discrepancy in the date of the murder as alleged in the information and as established during the trial fatal to the prosecution's case?
2. Is Delfin's alibi credible?
3. Was the qualifying circumstance of treachery rightly appreciated against Delfin?

Court's Decision:

The Supreme Court denied the appeal, sustaining the conviction of Delfin for murder. It addressed the issues as follows:

1. **Date Discrepancy:** The Court ruled the discrepancy in the date of the murder (between the information and evidence presented) was not fatal as dates are not material in crimes like murder where it's not necessary to state the precise date of the commission except when it is a material ingredient of the offense.
2. **Credibility of Alibi:** The Court found Delfin's alibi unavailing against the positive identification and testimony of an eyewitness. It emphasized that the defense of alibi must demonstrate it was physically impossible for the defendant to be at the scene of the crime, which Delfin failed to prove as his return from the fishing trip was confirmed to be within the timeframe of the crime.

3. **Treachery:** The Court affirmed the appreciation of treachery, reasoning that the sudden and deliberate attack on the unarmed victim, who was in no position to defend himself, qualified the murder charge.

Doctrine:

The Court reiterates the principle that in crimes where the date of commission is not a material element, it's not necessary to allege such date with absolute specificity in the information. It also upholds that a single, credible eyewitness account is sufficient to support a conviction for murder if it positively identifies the perpetrator.

Class Notes:

- **Date of Commission in Information:** The exact date of the commission of a crime need not be stated unless it is a material element of the offense.
- **Alibi:** The defense of alibi requires demonstrating physical impossibility for the defendant to be at the scene of the crime.
- **Treachery:** Treachery, as a qualifying circumstance in murder, is established when the attack is sudden, unexpected, and the victim is unable to defend themselves, thereby ensuring the execution without risk to the perpetrator.

Historical Background:

Historically, the case demonstrates the application and interpretation of key principles in criminal law within the Philippine judicial system, particularly pertaining to the adequacy of criminal informations, the strength of eyewitness testimony over alibi defenses, and the conditions under which treachery can significantly alter the sentencing outcome for a defendant.