

Title:

People of the Philippines vs. Edgardo Catacutan y Mortera (“People vs. Catacutan”)

Facts:

In Criminal Case No. Q-08-153138, Edgardo Catacutan y Mortera, also known as “Batibot,” “Enzo,” and “Gerry,” was charged with the crime of Robbery with Homicide for the killing of Alexander Tan Ngo on September 24, 2007, in Quezon City, Philippines. The case was brought forward after Catacutan allegedly went to Ngo’s rented room, stabbed him several times leading to his death, and thereafter stole several items belonging to the victim.

Upon arraignment, Catacutan pleaded not guilty. The prosecution presented witnesses including security guard Alfredo Ortiz Koh, classmate of the victim Robert John Ramos, neighbor Mark P. Adalid, National Bureau of Investigation Agent Valiant Raganit, Police Chief Inspector Annalee Palima, and the victim’s brother Gerry Ngo. Their collective testimonies detailed Catacutan’s identification at the scene, the circumstances of the discovery of the crime, the confession of the crime details to a friend, and the efforts to entrap Catacutan via a cellphone transaction related to the stolen items.

The Regional Trial Court of Quezon City, Branch 101, convicted Catacutan and sentenced him to reclusion perpetua without eligibility for parole, ordering him to pay compensatory damages to Ngo’s heirs. Catacutan appealed to the Court of Appeals in CA-G.R. CR-HC No. 11631, which affirmed the conviction, leading to the present appeal before the Supreme Court.

Issues:

1. Admissibility and credibility of witnesses’ testimonies, particularly Mark’s testimony as to the details of the commission of the crime relayed by Catacutan.
2. Applicability of the hearsay rule and the characterization of Mark’s testimony.
3. Determination if Catacutan committed the special complex crime of Robbery with Homicide.

Court’s Decision:

The Supreme Court affirmed that Catacutan’s admission to Mark P. Adalid about the crime details is admissible as evidence, being an admission against interest. The Court delineated the hearsay rule and independently relevant statements, identifying that the facts stated by Mark were intended to prove the truth of the events surrounding Alexander’s death, which Catacutan voluntarily shared, thus, fulfilling the criteria for an admission against interest.

However, the Court found that the prosecution failed to establish that robbery was the principal objective and modified the conviction from the special complex crime of Robbery with Homicide to separate crimes of Homicide and Theft. Catacutan was sentenced to an indeterminate penalty for Homicide and a fixed term for Theft, along with adjusted damages to the heirs of the victim.

Doctrine:

This case reiterates that an admission against interest is an exception to the hearsay rule, particularly when such admission involves matters of fact that are voluntarily made by the party and are prejudicial to his or her interest.

Class Notes:

- **Admission Against Interest**: An exception to the hearsay rule where a statement made by a party, which is against his or her own interest, can be used as evidence against him or her.
- **Special Complex Crime of Robbery with Homicide**: Requires that the robbery is the principal objective, and the homicide is incidental. If the intent to rob cannot be clearly established as preceding or concurrent with the killing, the accused may be convicted of separate offenses (i.e., Homicide and Theft) rather than the complex crime.
- **Article 294, RPC**: Defines the penalty for Robbery with Homicide.
- **Article 249, RPC**: Defines the penalty for Homicide.
- **Article 308 & 309, RPC**: Defines the crime and penalties for Theft.

Historical Background:

The distinction between the complex crime of Robbery with Homicide and the separate crimes of Homicide and Theft has significant implications on the penalties imposed. This case underscores the Supreme Court's role in ensuring that convictions adhere strictly to the elements of crimes as defined by law, providing a nuanced interpretation of criminal acts when the prosecution's evidence suggests alternative narratives to the charges.