

Title: People of the Philippines vs. Rico Dela Peña

Facts:

The case revolves around the murder of Olipio Gomez Amahit by Rico Dela Peña, his brother-in-law, in the afternoon of December 14, 2006, at Barangay Samak, Mabinay, Negros Oriental, Philippines. Ernie D. Amahit, the victim's son, testified that he witnessed the accused stab his father, who was asleep, multiple times with a bolo known locally as "pinuti." Dela Peña, in his defense, claimed that it was in self-defense as Olipio had attacked him first over a disagreement about uprooted banana plants.

The Regional Trial Court (RTC) of Branch 45, Bais City, found Dela Peña guilty of Murder in a judgment dated October 28, 2015, and sentenced him to reclusion perpetua, along with ordering him to pay damages to Olipio's heirs. On appeal, the Court of Appeals (CA) affirmed the RTC's decision and set the awards for civil indemnity, moral damages, exemplary damages, and temperate damages, inclusive of legal interest. Dela Peña appealed this decision to the Supreme Court.

Issues:

1. The credibility and consistency of the eyewitness's testimony.
2. The defense of self-defense claimed by Dela Peña.
3. The appreciation of the qualifying circumstance of treachery in the commission of murder.
4. The contention over the sufficiency of the Information provided in the charge against the accused.
5. The appropriateness of the penalties and damages awarded by the lower courts.

Court's Decision:

The Supreme Court dismissed the appeal for lack of merit, affirming the CA's decision. It held that:

1. **Credibility of Witnesses**: The Court accorded high respect to the trial court's assessment of the eyewitness's credibility, having had the opportunity to directly observe his demeanor.
2. **Self-defense**: The Court found the accused's invocation of self-defense unavailing, as the testimony of the prosecution's witness and the physical evidence contradicted his claims.
3. **Treachery**: The Supreme Court agreed with the lower courts that treachery was present, noting that the victim was asleep and in no position to defend himself, ensuring the

successful execution of the crime without risk to the assailant.

4. **Sufficiency of the Information**: The Court found the Information sufficient and noted that the accused had waived any objections by not raising them timely.

5. **Penalties and Damages**: It upheld the imposition of reclusion perpetua and the monetary damages awarded, in line with prevailing jurisprudence and the heinous nature of the crime.

Doctrine:

The Supreme Court reiterated that treachery is present when the manner of attack gives the defenseless victim no opportunity to defend himself or retaliate, and this qualifies the killing to murder. Additionally, the invocation of self-defense shifts the burden of proof to the defendant to establish the justifying circumstance convincingly.

Class Notes:

- **Treachery as Qualifying Circumstance**: When the attack ensures the victim's inability to defend or retaliate, transforming the killing into murder.
- **Self-Defense**: The accused must prove (1) unlawful aggression by the victim, (2) reasonable necessity of the means employed to prevent or repel it, and (3) the person defending did not provoke the victim.
- **Sufficiency of Information**: An information must outline the crime's elements, aiding in the accused's full understanding of charges, allowing for a fair defense.
- **Penalty and Damages in Murder Cases (Post RA 9346)**: Reclusion perpetua without parole, alongside civil indemnity, moral damages, and exemplary damages set at P100,000.00 each, where applicable.

Historical Background:

The resolution of this case reflects the Philippine legal system's treatment of violent crimes, emphasizing strict scrutiny of self-defense claims, the significance of eyewitness testimony (especially in the absence of mitigating circumstances), and the careful application of the qualifying circumstances that elevate homicide to murder. This is pivotal in ensuring justice and upholding the rule of law within the context of the country's criminal justice system.