

****Title**:** People of the Philippines vs. Noel Lee

****Facts**:**

This case centers around the murder of Joseph Marquez by the accused-appellant, Noel Lee, on September 29, 1996, in Caloocan City, Metro Manila. The Information charged Lee with murder, highlighting the use of a handgun, treachery, and evident premeditation. During the trial, the prosecution established that at the time of the incident, Joseph and his mother, Herminia Marquez, were watching television in their brightly lit living room when Lee, identifiable by Herminia, shot Joseph through an open window, causing fatal injuries. Despite initial dismissal due to “insufficiency of evidence,” the case was revisited upon Herminia’s appeal, leading to the filing of an Information for murder against Lee. Lee’s defense hinged on an alibi supported by witness testimonies and attempted to tarnish the victim’s reputation by presenting a letter from Herminia to the Mayor regarding Joseph’s drug problems. The trial court found Lee guilty, sentencing him to death and ordering compensations to the victim’s heirs, which brought the case to automatic review by the Supreme Court.

****Issues**:**

1. Credibility and consistency of eyewitness testimony, particularly contradictions in Herminia Marquez’s statements regarding the window through which the shooting occurred.
2. Evaluation of accused-appellant’s alibi against the eyewitness testimony.
3. Consideration of the victim’s character and its relevance to the case.
4. Application of aggravating circumstances, namely treachery, evident premeditation, and dwelling.

****Court’s Decision**:**

The Supreme Court delved into each issue, focusing heavily on the credibility of Herminia’s eyewitness account, which it found to be straightforward and consistent upon rigorous cross-examination. The Court deemed the inconsistencies between her affidavit and testimony as non-detrimental, affirming the conviction of Noel Lee for murder but modified the sentence to reclusion perpetua due to the absence of aggravating circumstances like dwelling. Moreover, character evidence regarding the victim was found irrelevant to the commission of the crime.

****Doctrine**:**

The decision reiterates the doctrine that inconsistencies between an affidavit and open

court testimony do not necessarily discredit the witness if the testimony in court is consistent and straightforward. Additionally, it consolidates legal principles regarding the evaluation of alibis and the irrelevance of the victim's character in the determination of guilt for crimes committed with treachery and evident premeditation.

****Class Notes**:**

- ****Character Evidence****: Inadmissible to prove conduct; exceptions include the accused proving good moral character pertinent to the offense charged and the character of the victim if it would prove the probability or improbability of the offense charged.
- ****Eyewitness Testimony****: Credibility is determined by the consistency of the narrative, with lesser weight given to discrepancies between an affidavit and testimony in court if the latter is coherent and unwavering.
- ****Alibi****: To be believed, must be supported by credible corroboration and shown that the accused could not have been at the scene of the crime.
- ****Treachery****: Ensures the execution of the crime without risk to the assailant from any defense the victim might make, qualifying the killing to murder.
- ****Reclusion Perpetua****: Imposed in the absence of qualifying aggravating circumstances, according to amendments in the Revised Rules of Criminal Procedure effective December 1, 2000.

****Historical Background**:**

This case reflects the judicial system's methodical approach to evaluating evidence and testimonies, highlighting the importance of eyewitness credibility, the limitations of character evidence, and the procedural necessities for convicting an individual of murder. It underscores adjustments in legal interpretations over time, particularly concerning the application of penalties and the evaluation of aggravating circumstances in criminal cases within the Philippine legal framework.