

Title:

People of the Philippines v. Al Madrolejos y Quililan

Facts:

On January 22, 2008, in Caloocan City, Metro Manila, Al Madrolejos, along with an unidentified John Doe, was involved in a robbery with homicide incident aboard a jeepney. The case was brought to the Regional Trial Court (RTC), Branch 128, Caloocan City, where Madrolejos pleaded not guilty. Various witnesses were presented by the prosecution, describing how Madrolejos and his companion declared a hold-up, resulting in the fatal shooting of Jovel Federeso Jacaban when he refused to hand over his bag. Madrolejos defended himself by arguing the shooting was accidental, a result of a scuffle with an individual he considered an enemy who also was aboard the jeepney.

The procedural journey saw the RTC convicting Madrolejos of robbery with homicide, sentencing him to Reclusion Perpetua, and mandating compensation to the victim's heirs. Dissatisfied, Madrolejos appealed to the Court of Appeals (CA), which modified the conviction to attempted robbery with homicide, adjusting the sentence accordingly. The decision was further appealed to the Supreme Court.

Issues:

1. **Credibility of Madrolejos' Version of Events:** Whether the court erred in not considering the self-defense argument by Madrolejos.
2. **Proof Beyond Reasonable Doubt:** Whether the prosecution failed to prove Madrolejos' guilt beyond reasonable doubt for the crime charged.
3. **Determination of Crime:** Whether the crime committed was robbery with homicide or attempted robbery with homicide.

Court's Decision:

The Supreme Court dismissed Madrolejos' appeal, affirming his conviction but reinstating the original charge of robbery with homicide. The Court dissected each legal issue methodically:

- **Credibility:** The Court found the consistent testimonies of the eyewitnesses more credible than Madrolejos' defense of accidental shooting.
- **Proof and Classification:** The Court highlighted the necessity for proving both the robbery and homicide elements convincingly. It concluded that both elements were satisfied: the announcement of the hold-up indicated intent to rob, and the shooting of Jovel confirmed the commission of homicide, making the complex crime of robbery with homicide

consummated not merely attempted.

- **Asportation and Homicide Nexus:** The Court clarified that although there was ambiguity regarding the actual taking of Jovel's bag, the testimonies confirmed the taking of belongings from other passengers. Thus, the condition of asportation necessary for robbery was met, and the nexus between the robbery and homicide was undisputed.

Doctrine:

In cases of robbery with homicide, the crime is considered consummated when both the intent to rob and the act of homicide are unequivocally established, regardless of whether the homicide occurs before, during, or after the act of robbery. The actual act of taking (asportation) can be inferred from the control exerted over the goods, and all participants in the robbery are deemed liable for the homicide if committed during or on the occasion of the robbery.

Class Notes:

- **Elements of Robbery with Homicide:** Intent to gain, violence or intimidation against a person, property belonging to another, and the homicide occurring on the occasion or by reason of the robbery.

- **Asportation:** The legal term referring to the taking or moving of property with the intent to deprive the owner of it. Proof of asportation solidifies the robbery element.

- **Complex Crime:** A single act constituting two or more grave or less grave felonies or when an offense is a necessary means for committing the other.

- **Reclusion Perpetua:** A penalty in the Philippine legal system that is equivalent to life imprisonment, though technically different in terms of parole possibilities and duration.

Historical Background:

This case represents the Philippine legal system's approach to handling cases of robbery with homicide, highlighting the emphasis on the coherence and reliability of eyewitness testimonies in determining guilt beyond reasonable doubt. It underlines the judiciary's stance on complex crimes, where a composite act leads to multiple offenses, treating such instances with a severity reflective of both the act's criminal intent and resultant harm.