

People of the Philippines v. Reynaldo Abayon y Aponte

Facts:

The case involves accused-appellant Reynaldo Abayon who was charged with arson resulting in multiple homicide following an incident on the 26th of July 2002, in Las Piñas City, Philippines. Abayon had a quarrel with his wife on the evening of July 25, 2002, which escalated to him strangling her. Neighbors intervened, and later that night, Abayon was seen handling an LPG gas tank and making threats about his utility, suggesting an intention to start a fire. Despite interventions, a fire broke out around midnight, resulting in the death of Lourdes Chokilo, Zenaida Velos, and Aiza Delos Angeles.

The case progressed from the Regional Trial Court (RTC) of Las Piñas City, where Abayon was found guilty, to the Court of Appeals (CA), which affirmed the RTC's decision. Subsequently, Abayon appealed to the Philippine Supreme Court.

Issues:

1. Whether the circumstantial evidence presented was sufficient to convict Abayon beyond reasonable doubt.
2. The classification and penalty of the crime committed by Abayon.
3. The proper damages payable by Abayon to the heirs of the victims.

Court's Decision:

The Supreme Court affirmed the conviction of Abayon for arson resulting in multiple homicide. It clarified that there is no complex crime of arson with homicide as the crime of arson absorbs the resulting deaths. The Court held that the circumstantial evidence, including Abayon's actions and statements before the fire broke out, his previous threats, and his purchase of matches with the stated intent to burn something, collectively led to the moral certainty of his guilt. The Supreme Court also upheld the principle that direct eyewitness testimony is not the sole means of identification and that circumstantial evidence can suffice for conviction.

Doctrine:

The decision reiterated the doctrines regarding the sufficiency of circumstantial evidence for conviction, the classification of the crime of arson when it results in death, and the standards for awarding damages in criminal cases.

Class Notes:

- **Circumstantial Evidence**: A combination of circumstances, when taken together, can

lead to a moral certainty of guilt of the accused, provided the facts from which inferences are derived are proven.

- **Arson Resulting in Multiple Homicide**: Under Philippine law, arson that results in death is not considered a complex crime. The deaths are absorbed by the crime of arson if the primary intent was to burn the building, increasing the penalty to reclusion perpetua to death.

- **Damages in Criminal Cases**: The Court can award civil indemnity, moral damages, exemplary damages, and temperate damages to the victims or their heirs based on the evidence presented and the actual losses suffered.

Historical Background:

The case demonstrates the application of circumstantial evidence in criminal proceedings in the Philippines and the jurisprudential approach to crimes involving arson and resulting deaths. It underscores the court's reliance on the totality of circumstances rather than direct evidence alone and highlights the evolving nature of legal debates around intention, crime classification, and the appropriate award of damages.