

People of the Philippines vs. Alberto Alejandro y Rigor & Joel Angeles y de Jesus

Title:

People of the Philippines vs. Alberto Alejandro y Rigor & Joel Angeles y de Jesus (G.R. No. 218399)

Facts:

On January 5, 1996, at around 2:30 AM in Nueva Ecija, AAA awoke to AAA's pleas for mercy as she witnessed accused-appellants, Alejandro and Angeles, mauling and stabbing BBB. The scene was illuminated by a kerosene lamp. Following BBB's murder, Angeles restrained AAA, and both Alejandro and Angeles took turns raping her. The assault ended when AAA lost consciousness and later awoke in a hospital to learn BBB had died.

Upon arrest, Alejandro pleaded not guilty to the charges of rape and homicide. Angeles was at large initially, but upon capture, he also pleaded not guilty. Despite their denials and alibis, the prosecution amended one of the rape Informations to implicate both men in a conspiracy. AAA's consistent and positive identification of the accused-appellants, corroborated by medical evidence, led to their conviction by the RTC. On appeal, the CA affirmed the convictions with modifications.

Issues:

1. **Whether the positive identification by AAA was sufficient for the conviction of Alejandro and Angeles for rape and homicide.**
2. **Whether there was a conspiracy between Alejandro and Angeles in committing the crimes.**
3. **Whether the penalties imposed were correct based on the crimes proven.**

Court's Decision:

Issue 1: Positive Identification

The Supreme Court affirmed that AAA's reliable identification of Alejandro and Angeles was sufficient for conviction. Her testimony, supported by the medical findings of sexual assault and the manner by which BBB was killed, was given credence. The Court also noted that AAA had no motive to falsely accuse them.

Issue 2: Conspiracy

Both the RTC and CA found sufficient evidence of conspiracy. The Court highlighted that both accused cooperated in assaulting and killing BBB and then took turns raping AAA while the other restrained her. Such acts collectively demonstrated a concerted effort in

perpetrating the crimes, confirming the conspiracy.

****Issue 3: Penalties****

The Supreme Court corrected the CA's error of convicting Angeles of two counts of rape in one case (Crim. Case No. 73-SD(96)), clarifying that only one count of rape had been charged in the Information. Furthermore, since the rape was committed by two persons, it should be classified as Qualified Rape. Therefore, Alejandro and Angeles were each convicted of Qualified Rape and Homicide with corresponding penalties:

- ****Qualified Rape:**** reclusion perpetua and monetary damages of P75,000 as civil indemnity, P75,000 as moral damages, and P75,000 as exemplary damages.
- ****Homicide:**** indeterminate imprisonment from six (6) years and one (1) day of prison mayor to fourteen (14) years, eight (8) months, and one (1) day of reclusion temporal, and monetary damages to BBB's heirs, totaling P150,000.

Doctrine:

1. ****Positive Identification:**** Testimony of a credible witness who identified the accused as the culprits can be sufficient to uphold a conviction despite the presence of weak denials and alibis.
2. ****Conspiracy:**** Conspiracy is established by collective acts undertaken to accomplish the same criminal objective.
3. ****Penalties for Qualified Rape:**** Under the RPC, when rape is committed by two or more persons, the crime is upgraded to Qualified Rape, punishable by reclusion perpetua to death.

Class Notes:

- ****Elements of Rape (Article 335 RPC):****
 1. Carnal knowledge of a woman.
 2. Accomplished by using force, intimidation, or when the woman is deprived of reason/unconscious, or under 12 years of age.
- ****Elements of Homicide (Article 249 RPC):****
 1. Person killed.
 2. Accused killed the person without justifying circumstances.
 3. Intention to kill is presumed.
 4. Killing not attended by qualifying circumstances.
- ****Conspiracy:**** Indicated when two or more persons cooperatively undertake actions to

accomplish the same criminal result.

Historical Background:

The case underscores issues prevalent in rural Philippines during the 1990s — particularly crimes against women and children within intimate domestic settings. It also highlights the procedural evolutions in criminal law, emphasizing amendments and correct applications of conspiracy doctrines. During this period, legal proceedings in the Philippines began to incorporate more stringent measures to protect victims of violent and exploitative crimes.