

Antonio Andres and Rodolfo Duran vs. The People of the Philippines

Facts:

On September 6, 2002, in Sta. Maria, Bulacan, Catalino Eugenio reported that his motorized Kawasaki tricycle worth Php 140,000 was stolen. The tricycle was allegedly taken by Antonio Andres and Rodolfo Duran. The owners and petitioners conspired to steal and carry away the tricycle without the owner's consent.

Upon being charged with violating Republic Act No. 6539 (Anti-Carnapping Act of 1972), both petitioners pled not guilty. The trial proceeded on the merits in the Regional Trial Court (RTC) Branch 18, Malolos City, Bulacan. On June 1, 2006, the RTC convicted Antonio and Rodolfo, sentencing them to imprisonment terms of seventeen (17) years and four (4) months to thirty (30) years.

Petitioners appealed to the Court of Appeals (CA), which affirmed the RTC's decision with modification, sentencing them to an indeterminate prison term ranging from seventeen (17) years and four (4) months, as the minimum, to thirty (30) years as the maximum. Subsequent motions for reconsideration by the petitioners were denied by CA in its December 17, 2008, resolution. This led to a petition brought before the Supreme Court under Rule 45 of the Rules of Court, focusing on errors of law rather than facts.

Issues:

1. Whether the CA erred in giving full credence to the testimonies of prosecution witnesses while dismissing the theory of the defense.
2. Whether the CA erred in finding petitioners guilty despite alleged insufficient evidence to prove guilt beyond reasonable doubt.
3. Whether the penalty imposed by the lower courts was erroneous considering the elements and circumstances of the crime charged.

Court's Decision:

1. **Credibility of Witnesses:**

The Court noted that under Rule 45, its review is limited to errors of law and does not extend to reassessing factual findings unless they are bereft of substantial evidence or are based on a misapprehension of facts. The Court found no error in the CA's reliance on the trial court's factual findings, including the witness testimonies, indicating that the light conditions did not significantly impair the identification of the accused by the witness.

2. **Proof Beyond Reasonable Doubt:**

The Court upheld the lower courts' rulings, indicating that the totality of evidence presented by the prosecution sufficiently established the guilt of petitioners beyond a reasonable doubt. The testimonial and documentary evidence presented were duly scrutinized and were found credible.

3. **Propriety of the Penalty Imposed:**

Key to the Court's review was the appropriate penalty under RA No. 6539. The Supreme Court found merit in this aspect of the petitioners' argument. The Information did not allege that the carnapping involved violence, intimidation, or force upon things. Under Section 14 of RA No. 6539, the default penalty for simple carnapping (absent these aggravating circumstances) ranges from fourteen (14) years and eight (8) months to seventeen (17) years and four (4) months.

The Court recognized an error in the lower courts' appreciation of enhanced penalties due to factual circumstances proven during trial but not stipulated in the charge. Thus, the appropriate penalty must fall within the statutory guideline for simple carnapping.

Doctrine:

- **Rule 45 Review Scope:** Supreme Court's jurisdiction under a petition for review on certiorari is confined to errors of law absent evident misapprehension of facts.
- **Pleading Requirements:** Sentences must adhere strictly to allegations in the Information; factual circumstances affecting penalties must be explicitly charged.
- **Statutory Penalties:** Courts must impose penalties within the bounds set by applicable laws, considering only the allegations proven and charged.

Class Notes:

- **Carnapping (RA No. 6539) - Defined under Section 2:** Unauthorized taking of a motor vehicle with intent of gain, irrespective of the vehicle's value.
- **Penalty Provisions (Section 14 RA 6539):**
 - Simple carnapping: 14 years & 8 months to 17 years & 4 months.
 - Carnapping with violence/force/intimidation: 17 years & 4 months to 30 years.
 - Resulting in murder/rape: Reclusion Perpetua to Death.
- **Indeterminate Sentence Law Applications:** Minimum and maximum terms to reflect statutory provisions absent aggravating circumstances proven at trial.

Historical Background:

The case occurred within the framework of the judicial period marked by rigorous

adjudication processes enshrined under the 1987 Philippine Constitution. The Anti-Carnapping Act of 1972 (RA No. 6539) took a pivotal role during this era, addressing the prevalent crime of vehicle theft with statutory guidelines for proportionate punitive actions aimed at deterrence.

This case underscores diligent adherence to substantive and procedural mandates ensuring equitable justice served under legally bound principles.