

Title:

People of the Philippines vs. Glenn de los Santos, G.R. No. 128386

Facts:

On October 5, 1995, at around 2:20 a.m., members of the Philippine National Police (PNP) were undergoing an “endurance run” on Maitum Highway, Cagayan de Oro City. The trainees, in three columns, were wearing black T-shirts, black shorts, and combat shoes. Glenn de los Santos drove an Isuzu Elf truck and, despite signals from the PNP trainees to take the left lane, accelerated and rammed into them, killing 13 trainees and seriously injuring others. The vehicle did not stop even after the initial impact. De los Santos surrendered later that day.

In the Regional Trial Court (RTC) of Cagayan de Oro City, De los Santos was charged with multiple counts of murder, frustrated murder, and attempted murder. The trial court conducted an ocular inspection of the site and vehicle, finding substantial damage consistent with hitting multiple people. Prosecution witnesses testified to the events, highlighting De los Santos’ failure to heed warnings and the speed of his vehicle. De los Santos claimed impaired visibility due to oncoming headlights and that the incident was accidental.

The RTC convicted De los Santos of the complex crime of multiple murder, multiple frustrated murder, and multiple attempted murder, sentenced him to death, and ordered indemnities. De los Santos appealed, citing errors in the RTC’s findings.

Issues:

1. Did De los Santos have the intent to kill the PNP trainees?
2. Was the incident a result of reckless imprudence rather than a deliberate act?
3. Were the penalties and damages awarded by the RTC appropriate?

Court’s Decision:

1. **Intent to Kill:**

- The Supreme Court found no evidence of De los Santos’ intent to kill. The tragic event was attributed to reckless imprudence rather than malicious intent. The prosecution’s theory that De los Santos deliberately hit the trainees was not sufficiently substantiated.

2. **Reckless Imprudence:**

- The Court determined that the incident resulted from reckless imprudence. Factors such as the dark, foggy conditions, the improper lane usage by the PNP trainees, and De los

Santos' momentary blindness from an oncoming vehicle's bright lights contributed to the incident. De los Santos' failure to take immediate action upon the first impact constituted negligence.

3. **Penalties and Damages:**

- The Court reclassified the offense as reckless imprudence resulting in multiple homicide with serious physical injuries and less serious physical injuries. Based on Article 48 of the Revised Penal Code, De los Santos was sentenced to an indeterminate penalty ranging from four (4) years of prision correccional to ten (10) years of prision mayor.
- For ten counts of reckless imprudence resulting in slight physical injuries, he was sentenced to two (2) months of arresto mayor per count.
- Death indemnities were reduced to P50,000 for each group of heirs, and awards for injuries were deleted due to lack of factual basis.

Doctrine:

- **Doctrine of Reckless Imprudence:** Intent to kill must be proven for convictions of murder. Without sufficient proof of intent, the offense may be reclassified to reckless imprudence where negligence is present but without intent to cause harm.
- **Article 48 (Complex Crimes):** When a single negligent act results in multiple grave or less grave felonies, the penalty for the most serious crime is imposed in its maximum period.
- **Article 365 of the Revised Penal Code:** Defines reckless imprudence and penalties based on resulting damage or injury, with higher penalties for failures to render aid.

Class Notes:

- **Reckless Imprudence:** A person acts recklessly if they fail to do something that a reasonably prudent person would do under similar circumstances, resulting in harm.
- **Intent vs. Negligence:** The prosecution must establish beyond reasonable doubt the intent to kill for murder charges. In the absence of such proof, the charge may be downgraded to reckless imprudence.
- **Indeterminate Sentence Law:** Allows courts to impose a range of penalties with a minimum and maximum duration based on the gravity of the offense and any mitigating/aggravating circumstances.

Historical Background:

- The case underscores the standards of criminal liability concerning vehicular accidents involving serious harm or fatalities. The distinction between intentional acts and reckless imprudence is critical in determining appropriate penalties within Philippine jurisprudence.