

# Case Brief: Suerte-Felipe vs. People of the Philippines

### Title: Romeo I. Suerte-Felipe vs. People of the Philippines, G.R. No. 26162

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### Facts:

On July 11, 1999, at around 7:30 PM in Barangay 180, Maricaban, Pasay City, an altercation erupted between Romeo I. Suerte-Felipe (petitioner) and Godofredo Ariate (deceased). Witnesses testified to seeing them argue before Suerte-Felipe, accompanied by PO3 Edison Madriago and PO3 Eduardo Jimeno, shot Ariate with a .45 caliber firearm. Ariate sustained multiple gunshot wounds and was declared dead on arrival at the Pasay City General Hospital.

According to the prosecution:

1. Rodolfo Alumbres witnessed the argument and subsequent shooting by Suerte-Felipe.
2. Barangay Chairman Pio Arce and Ariate's son also witnessed the events, seeing Suerte-Felipe and his companions fire at them, resulting in an exchange of gunfire.
3. An autopsy conducted by Dr. Ludovino J. Lagat revealed three gunshot wounds on Ariate's body. A ballistics examination matched the slug to a .45 caliber firearm.

Suerte-Felipe's defense alleged:

1. Ariate and his companions were the aggressors, attacking him, Madriago, and Jimeno.
2. In self-defense, Suerte-Felipe drew his .45 caliber firearm but claimed the shots were accidental.
3. Danilo Villa, a street vendor, supported Suerte-Felipe's account but admitted under scrutiny that he had not previously mentioned his testimony to anyone.

Procedural Posture:

1. **Regional Trial Court (RTC)**: On November 8, 2001, RTC Pasay City found Suerte-Felipe guilty of homicide, sentencing him to an indeterminate penalty of eight years and one day as a minimum to 17 years as maximum, and ordered him to pay P71,800.00 to Ariate's heirs.
2. **Court of Appeals (CA)**: Suerte-Felipe's appeal was partially granted modifying the RTC's judgment to include moral damages of P50,000.00.
3. **Supreme Court**: Suerte-Felipe filed a Petition for Review on Certiorari questioning the sufficiency of evidence, particularly the identification of Ariate's autopsied body, the ballistic findings, and the credibility of witnesses.

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### Issues:

1. **Identifying the Autopsied Body**: Whether the prosecution sufficiently identified that the body autopsied by Dr. Lagat was indeed Godofredo Ariate.
2. **Evidence Linking the Slug to Suerte-Felipe's Firearm**: Whether there was clear evidence proving that the fatal slug recovered was from Suerte-Felipe's .45 caliber firearm.
3. **Credibility of Witnesses**: Whether the testimonies of the prosecution witnesses were credible and sufficient to establish Suerte-Felipe's guilt beyond reasonable doubt.
4. **Physical Evidence vs. Testimonial Evidence**: Whether the combined physical and testimonial evidence submitted by the prosecution could prove Suerte-Felipe's guilt beyond reasonable doubt.

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### Court's Decision:

1. **Identification of the Autopsied Body**:
  - The Supreme Court upheld the CA's finding. The Certificate of Identification of Dead Body signed by Godofredo's son Edgardo and photographs taken during the autopsy affirmed that the body was Godofredo Ariate's. The entries in the certificate were treated as prima facie evidence under the Rules of Court.
2. **Ballistics and Origin of the Fatal Slug**:
  - Despite the absence of a direct ballistic comparison (since Suerte-Felipe did not produce his firearm), the slug's characteristics identified it as coming from a .45 caliber firearm, exclusively carried by Suerte-Felipe during the incident. Witness testimonies connecting the events supported the conclusion beyond reasonable doubt.
3. **Credibility of Prosecution Witnesses**:
  - The court found the testimonies of Rodolfo Alumbres and Pio Arce credible, despite minor inconsistencies. The trial court's observations on the demeanor and consistency of their core narratives were affirmed. These testimonies corroborated the sequence of events leading to Godofredo Ariate's death, positively identifying Suerte-Felipe as the shooter.
4. **Evidentiary Weight**:
  - The Supreme Court concurred with lower courts that the combination of physical evidence (ballistic analysis and autopsy reports) and credible eyewitness testimonies were sufficient. Circumstantial evidence was patently adequate to uphold the trial court's conviction.

The decision of the CA was thus affirmed, denying the petition and maintaining the penalties, including the additional award of moral damages.

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### ### Doctrine:

1. **Circumstantial Evidence**: Circumstantial evidence, even when physical evidence is partially absent or inconclusive, can sufficiently uphold a conviction when it points conclusively towards the accused's guilt when taken collectively.
2. **Prima Facie Evidence**: Entries in official documents like a Certificate of Identification of Dead Body are prima facie evidence of the facts stated unless convincingly rebutted.
3. **Credibility of Witnesses**: Appellate courts generally uphold the trial court's assessment of witness credibility barring clear evidence of substantial errors.

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### ### Class Notes:

1. **Homicide**: Defined under Article 249 of the Revised Penal Code, which includes voluntary killing without the qualifying circumstances of murder.
2. **Testimonial Evidence**: Credibility depends on the witness's demeanor, consistency, and corroboration of their testimonies with physical evidence.
3. **Rule 132, Rules of Court**:
  - **Section 19**: Public documents as prima facie evidence.
  - **Section 23**: Public records as evidence even against third persons.

### ### Historical Background:

The case arose during a period marked by significant legal reforms and evolving judicial scrutiny in the Philippines, focusing on the evidentiary standards and reliability of identification procedures in criminal jurisprudence. The ruling underscored the balanced evaluation of physical and testimonial evidence whilst reinforcing the judicial precedent on the credibility of eyewitness accounts in the face of circumstantial complexities.