

People of the Philippines vs. Paulino Delos Santos, Jr. alias “Skylab”

Facts

On the evening of May 8, 2011, Paulino Delos Santos, Jr., also known as “Skylab,” was involved in a series of events that led up to his father’s death. On that night, Michael L. San Gabriel and others were socializing at Jovito Libanan’s house on Macolabo Island, Paracale, Camarines Norte. Paulino Delos Santos, Sr., the victim, was awakened when Skylab, armed and intoxicated, engaged in a heated argument with his brother Marcos. Upon their father’s intervention, Skylab challenged him, leading to Paulino Sr. being stabbed in the chest by Skylab.

The trial commenced upon Skylab’s plea of “not guilty.” The prosecution presented testimonies from Michael, PO3 Gil Obog, and Dr. Virginia B. Mazo. In contrast, Skylab claimed innocence, attributing the event to Jovito.

After the trial, on September 5, 2016, the RTC Daet, Camarines Norte Branch 39 found Skylab guilty of parricide, sentencing him to reclusion perpetua with various monetary penalties.

Skylab appealed to the Court of Appeals, which affirmed the RTC decision on June 28, 2018, imposing a 6% interest per annum on the monetary awards. Skylab subsequently elevated his appeal to the Supreme Court.

Issues

1. Did the Court of Appeals err in affirming Skylab’s conviction for parricide?
2. Was there sufficient proof beyond reasonable doubt to establish Skylab’s guilt?

Court’s Decision

The Supreme Court affirmed Skylab’s conviction with modifications:

Resolution of Issues

1. **Third Element of Parricide**: Skylab’s relationship with the victim (his father) was undisputed, partly because of his admission during the trial, notwithstanding the absence of documentary evidence like a birth certificate.
2. **Eyewitness Account**: Michael’s testimony, viewed as credible and straightforward by both lower courts, was pivotal. His detailed account directly identified Skylab as the person who inflicted the fatal wound.

3. **Credibility of Testimony**: Michael's narrative was consistent and aligned with physical evidence (the death certificate). His account sufficiently covered the crime's essential elements, and minor unspecified details were deemed inconsequential.
4. **Corroborative Evidence**: Skylab's argument regarding the non-presentation of other witnesses failed, as corroborative evidence was unnecessary where a single credible witness provided a complete account.
5. **Motive**: Although Skylab's motive was tenuous, his intoxicated state and the altercation with his family that evening dispelled his assertion of an absence of motive.
6. **Flight**: Skylab's immediate escape from the scene was interpreted as an indication of guilt.
7. **Denial and Alibi**: Skylab's defenses were dismissed as self-serving and unsubstantiated, especially given his proximity to the crime scene.
8. **Penalty**: The sentence of reclusion perpetua was confirmed, and the monetary penalties adjusted to P75,000 each for civil indemnity, moral damages, and exemplary damages, plus P50,000 in temperate damages, with a 6% interest per annum until full payment.

Doctrine

The case underscored that the testimony of a single credible eyewitness could suffice for a conviction if it convincingly proves the commission of the crime and the identity of the perpetrator. Minor inconsistencies do not outweigh the credible identification of the accused. Additionally, flight post-crime is a strong indicator of guilt.

Class Notes

- **Elements of Parricide (Article 246 of the Revised Penal Code)**:
 1. A person is killed.
 2. The accused is the killer.
 3. The victim is a spouse, parent, child, or ascendant/descendant of the accused.
- **Credibility of Eyewitness Testimony**:
 - Must be positive, categorical, and consistent with physical evidence.
 - Corroborative evidence is not necessary if the eyewitness testimony is reliable.
- **Flight as Evidence of Guilt**:

- An accused's escape from the crime scene may be considered an indication of guilt.

Historical Background

The case reflects the Philippine judiciary's strict adherence to legal principles concerning testimonial evidence and the burden of proof in parricide cases. Emphasizing the sufficiency of credible eyewitness testimony despite the lack of multiple witnesses or documentary evidence, it consolidates jurisprudence on the weight of verbal admissions and the irrelevance of motive when guilt is plainly established. This case continues the trend of thorough scrutiny of facts and procedural correctness in criminal appeals.