

****Title: People of the Philippines vs. Eugenio Crisostomo****

****Facts:****

On December 25, 1967, between 6:00 and 7:00 PM, Eugenio Crisostomo encountered Romeo Geronimo near the latter's house in Sto. Rosario, Hagonoy, Bulacan. Crisostomo invited Geronimo for a drink, but Geronimo declined. Crisostomo then shot Geronimo in the back with a .22 caliber revolver, from a distance of about one meter. The bullet entered below Geronimo's left armpit and exited through the right side of his chest. Geronimo fell to the ground, was rushed to Reyes Hospital but was pronounced dead on arrival. Eyewitnesses, who were friends to both Geronimo and Crisostomo, testified to these events.

An information for murder was filed against Crisostomo, charging him with willful, unlawful, and felonious killing with evident premeditation and treachery. Crisostomo was arraigned and pleaded not guilty. He later sought to plead guilty to a lesser homicide charge, which the prosecution did not agree to, leading to a full trial. The trial court convicted Crisostomo of murder and sentenced him to Reclusion Perpetua.

Crisostomo appealed, citing several alleged errors by the trial court, which included improper findings on treachery, lack of evidence beyond reasonable doubt for the cause of death, denial of mitigating circumstances (drunkenness, voluntary surrender, plea to a lesser charge), and the assertion that he admitted only to an accidental killing.

****Issues:****

1. Whether the trial court erred in finding that Crisostomo admitted killing Geronimo.
2. Whether the trial court erred in establishing evidence beyond reasonable doubt as to the cause of death without an autopsy.
3. Whether the trial court correctly found the presence of treachery in the commission of the crime.
4. Whether Crisostomo should be credited with the mitigating circumstance of drunkenness.
5. Whether Crisostomo is entitled to the mitigating circumstance of voluntary surrender.
6. Whether the offer to plead guilty to homicide should mitigate the charge.
7. Whether accused should get the privileged mitigating circumstance due to two ordinary mitigating circumstances.

****Court's Decision:****

1. **Admission of Killing:** The Supreme Court found that Crisostomo effectively admitted to shooting Geronimo, particularly through his own testimony, showcasing an admitted intentional act rather than an accidental one.
2. **Cause of Death:** The Court determined that, despite the absence of an autopsy, the testimony of Dr. Juan Santos, who examined the body right after the incident, established the cause of death as a gunshot wound. His certification, combined with eyewitness testimony and other evidence, was sufficient.
3. **Treachery:** The mode of attack by Crisostomo was sudden and ensured no defense from the victim, while existing animosity provided further context. The sneaky invitation for drinks and the subsequent shooting from behind qualified for alevosia (treachery).
4. **Drunkenness:** The Supreme Court found no evidence to support intoxication to a mitigating degree. Crisostomo's ability to remember and act coherently post-incident indicated the state wasn't severe to influence rationality.
5. **Voluntary Surrender:** Crisostomo's argument succeeded. He met all criteria for voluntary surrender, thereby mitigating his criminal culpability.
6. **Offer to Plead Guilty to Homicide:** The Court ruled that since Crisostomo made his offer after the presentation of evidence, it does not qualify as mitigating.
7. **Privileged Mitigating:** The combination of ordinary mitigating circumstances without aggravating factors did not apply considering the qualified nature of the crime as murder.

The Court revised Crisostomo's sentence applying the Indeterminate Sentence Law to imprisonment from 10 years and 1 day to 17 years, 4 months, and 1 day. The indemnity to the victim's heirs was increased from P12,000 to P30,000.

Doctrine:

1. **Treachery/Internal Evidence Sufficiency:** Sudden attacks, particularly with lethal weaponry against an unarmed victim, qualify as treachery irrespective of prior conflict resolution claims.
2. **Standard for Cause of Death:** Death certificates issued by healthcare officers in official capacity serve as prima facie evidence even without autopsy, pending cross-examination and supportive testimonial evidence.

****Class Notes:****

1. ****Elements of Treachery:**** Sudden attack, conscious adoption to prevent defense, and leverage of position or method.
2. ****Mitigating Circumstances:**** Article 15, RPC (drunkenness), Article 13, RPC (voluntary plea - pre-evidence stage).
3. ****Requisites for Voluntary Surrender:**** Non-arrest, surrender to authority, and voluntary demeanor.
4. ****Evidentiary Weight of Death Certificates:**** Rule 130, Section 38, ROC.

****Historical Background:****

The case reflects the judicial processes and evidentiary standards in the Philippines during the late 1960s, emphasizing principles affecting criminal liability, particularly around the nuances of aggravating and mitigating circumstances within the stern backdrop of penal statutes like the Revised Penal Code. This era also saw an evolving appreciation of procedural justice, balancing rights of the accused against societal and victim rights.