

Title: People of the Philippines vs. Ricardo Garcia alias Carding, Christopher Garcia, and Andrew Tomelden alias Andut Duling

Facts:

1. **Background of the Case:**

- Barangay Captain Jaime Garcia of Barangay Pugaro, Dagupan City, was murdered. His nephew Christopher Garcia became barangay captain after his death. Ricardo Garcia (“Carding”), Jaime’s brother, faced the accusation alongside Christopher.
- PO3 Wilfredo Sanoy served as a security guard-driver for Assistant City Engineer Ismael dela Cruz, who received death threats from the Garcia family.

2. **Incident on February 24, 1999:**

- At 9 AM, Engr. dela Cruz and Wilfredo were traveling in a Mitsubishi car when they noticed a motorcycle with Christopher, Ricardo, and Andrew Tomelden tailing them.
- At an intersection, their car was blocked by a jeepney. Andrew’s motorcycle stopped next to their car, and Ricardo shot Engr. dela Cruz in the forehead and forearm, also injuring Wilfredo.
- Both victims were rushed to the hospital. Despite surgery, Engr. dela Cruz died on March 11, 1999.

3. **Investigation and Charges:**

- PO1 Gaspar Dacpano conducted the initial investigation, finding three empty .45 caliber shells. Dr. Winston Tan’s autopsy confirmed that Engr. dela Cruz died due to intracranial hemorrhage from gunshot wounds.
- On May 4, 1999, an Information was filed charging Ricardo, Christopher, and Andrew with murder.

4. **Arrest and Trial:**

- Ricardo was arrested on December 10, 1999; he faced separately pending charges of murder and attempted murder.
- Ricardo, assisted by a counsel, pled not guilty. He interposed an alibi and denial, claiming he was working as a mason in San Fabian during the incident.

Issues:

1. **Credibility of Witness:**

- Whether the trial court erred in fully accepting Wilfredo Sanoy’s testimony despite alleged inconsistencies and contradictions.

2. **Assessment of Physical Evidence:**

- Whether the physical evidence and trajectory of the bullets supported Wilfredo's account of the crime.

3. **Qualifying and Aggravating Circumstances:**

- Whether treachery and the use of the motorcycle as an aggravating circumstance were appropriately considered by the trial court.

Court's Decision:

1. **On the Credibility of the Witness:**

- The Supreme Court upheld the credibility of Wilfredo Sanoy, citing the trial court's unique position to observe the witness's demeanor. Minor inconsistencies were attributed to the shock from the incident and were deemed non-detrimental to the witness's truthfulness.

2. **On the Physical Evidence:**

- The Court found the physical evidence consistent with the testimonies. The absence of gunpowder residue was attributed to surgical interventions post-incident, and the trajectory of the bullets was deemed possible given the victim's defensive movements.

3. **On the Qualifying and Aggravating Circumstances:**

- The Court upheld the conviction of murder qualified by treachery. However, it ruled that the use of a motor vehicle as an aggravating circumstance could not be considered as it was not alleged in the Information. Consequently, Ricardo was sentenced to reclusion perpetua instead of death.

Doctrine:

- **Credibility of Witness Testimony:** Minor inconsistencies in testimonies due to the traumatic nature of the event do not necessarily impair a witness's credibility.

- **Qualifying and Aggravating Circumstances:** Aggravating circumstances must be explicitly alleged in the Information to be considered in sentencing per Section 8, Rule 110 of Revised Rules of Criminal Procedure.

Class Notes:

- **Essential Elements of Murder (Art. 248, Revised Penal Code):**

1. The act was willful or intentional.
2. The act resulted in death.
3. The victim was unlawfully killed.
4. There was evident premeditation, treachery, or other qualifying circumstances.

- **Life Expectancy Calculation Formula:** $\frac{2}{3} \times (80 - \text{age of the victim at death})$
- **Compensation for Damages:** If actual expenses are not fully evidenced, temperate and exemplary damages may be awarded based on standard compensatory principles (People vs. Catubig).

Historical Background:

- The case emerges from a family feud leading to a violent resolution, reflecting socio-political conflicts at the barangay level. The legal proceedings highlight procedural requirements for aggravating circumstances and aim to fortify fairness in criminal justice administration. The ruling marked a significant use of testimonial credibility versus physical evidence in Filipino jurisprudence.