

Title:

Michael John Robles vs. People of the Philippines, G.R. No. CEB-CR No. 02067

Facts:

1. **Incident Date:** Around 1:00 a.m., July 27, 2009.
2. **Location:** Intersection of Carlos P. Garcia (CPG) North Avenue, Calceta Street, and Benigno Aquino Avenue, Tagbilaran City, Philippines.
3. **Incident:** Collision between Yamaha Crypton motorcycle driven by Ronelo Solas with back-rider Renilda Dimpel and Suzuki Raider motorcycle driven by Michael John Robles.
4. **Prosecution Argument:**
 - Yamaha Crypton was cruising on CPG Avenue.
 - Suzuki Raider came from Calceta Street, crossed CPG Avenue, causing the collision.
 - Robles had no driver's license; his motorcycle was unregistered.
 - Ronelo died at 9:20 a.m. due to injuries; Renilda had less serious physical injuries.
5. **Defense Argument:**
 - Robles was driving northward on CPG Avenue and signaled to turn left onto Benigno Aquino Avenue.
 - Ronelo attempted to overtake Robles, causing the collision near the intersection.
6. **Materials Presented:**
 - Photos of the damaged motorcycles.
 - Testimonies from various witnesses for both prosecution and defense, including a traffic investigator's report suggesting Robles was driving on CPG Avenue, not crossing from Calceta Street.

Procedural Posture:

- **MTCC Decision (February 9, 2012):** Guilty of Reckless Imprudence Resulting in Homicide, Less Serious Physical Injuries, and Damage to Property.
- Sentenced to one year of prision correccional as minimum to five years of prision correccional as maximum.
- **RTC Decision (November 29, 2012):** Affirmed MTCC's decision.
- **CA Decision (August 27, 2015):** Affirmed lower court's decisions.
- **Robles' Motion for Reconsideration (January 23, 2013):** Denied.
- **Petition for Review on Certiorari filed (May 7, 2016):** Robles questioned the findings and highlighted discrepancies in the prosecution's case.

Issues:

1. **Primary Issue:** Whether Robles is guilty beyond reasonable doubt of Reckless

Imprudence resulting in Homicide, Less Serious Physical Injuries, and Damage to Property.

2. **Sub-Issues:**

- Credibility of the prosecution's and defense's versions of the incident.
- Assessment of compliance with traffic rules by Robles.
- Applicability of presumption of regularity in official functions and evidence integrity.

Court's Decision:

Supreme Court Decision:

- **Acquittal:** The Supreme Court found the defense's version more credible and highlighted the significant oversights in the prosecution's evidence and the investigations by the lower courts.
- **Key Points:**
 - **Police Investigation:** PO3 Fabio Maulas' report indicated that Robles was traveling on CPG Avenue and not crossing from Calceta Street.
 - **Physical Evidence:** Damage on Robles' motorcycle's left side was consistent with being hit while signaling to turn left, not with crossing CPG Avenue.
 - **Discrepancies in Testimony:** The prosecution's testimony, particularly about the collision dynamics and site, was inconsistent with physical evidence and the Information filed.
 - **Presumption of Regularity:** The presumption of officiality in PO3 Maulas' investigation report stood unchallenged.

Doctrine:

1. **Presumption of Regularity:** Official duties are presumed to be done regularly unless clear and convincing evidence demonstrates otherwise.
2. **Physical Evidence over Testimonial Evidence:** Physical evidence takes precedence when it contradicts testimonial evidence.
3. **Reasonable Doubt and Acquittals in Criminal Cases:** Conviction must rest on establishing guilt beyond a reasonable doubt.

Class Notes:

- **Elements of Reckless Imprudence (Article 365 of RPC):**
 1. Voluntary act/failure to act.
 2. Without malice.
 3. Resulting in material damage due to inexcusable lack of precaution.
- **Critical Sections in Traffic Code Discussed:**
 - **Sec. 42(d):** Stop at through highways.

- **Sec. 43(c)** Yield right-of-way at stop intersections.
- **Application of Regularity Presumption:**
- Police reports should be given weight unless directly contradicted by clear evidence.

Historical Background:

Transportation and Traffic Context (2009):

- Increased vehicular traffic and awareness of traffic laws due to rising incidents and urbanization pressures.
- Land Transportation and Traffic Code (Republic Act No. 4136) enacted in 1964, reflective of older traffic management needs and periodically updated to address changing urban dynamics.

The case underscores the importance of evaluating the integrity and consistency of both testimonial and physical evidence in criminal proceedings, emphasizing the critical role of thorough and objective police investigations in vehicular incident cases.