

Title: People of the Philippines vs. Leo Macaliag, Jesse Torre, a.k.a “Sasot,” and Juliver Chua, a.k.a “Botyok”

Facts:

- **Initial Incident (April 16, 1995):**
- Brian Jalani was assaulted near Baslayan Creek, Iligan City.
- Eyewitness Anacleto Moste witnessed the event and identified Leo Macaliag, Jesse Torre, and Juliver Chua as the attackers.
- Moste saw Torre holding Jalani while Chua and Macaliag took turns stabbing him.
- **Immediate Aftermath:**
- Moste and others took Jalani to Dr. Uy Hospital where he died.
- **Police Investigation:**
- Dr. Livey Villarín confirmed multiple stab wounds.
- SPO4 Antonio Lubang received a report from Moste about the incident.
- **Arrests and Proceedings:**
- Arrest of Juliver Chua (Feb 1, 1996), followed by the arrests of Macaliag and Torre (June 1996).
- During arraignment, all accused pleaded not guilty.
- Defendants presented alibis: Chua at a disco, Torre at home with fever, and Macaliag drinking at home.
- **Prosecution vs Defense:**
- Prosecution relied on Moste’s testimony and medical evidence.
- Defense claimed weak witness testimony and robust alibi.

Issues:

1. **Credibility of the Eyewitness:**
 - Was Moste’s testimony credible despite defense allegations?
2. **Sufficiency of Evidence:**
 - Did the prosecution prove guilt beyond reasonable doubt?
3. **Appropriate Charge:**
 - Whether the judgment for murder was correct or if it should have been for a lesser offense like homicide.

Court’s Decision:

1. **Credibility of Eyewitness:**
 - **Issue:** Defense claimed Moste’s testimony was not credible, questioning his bravery and the feasibility of his observations.

- **Resolution:** Court found Moste credible, citing his past experience and the veracity of direct observation.

2. **Sufficiency of Evidence:**

- **Issue:** Defense argued that prosecution failed to establish guilt beyond reasonable doubt and overestimated Moste's testimony.

- **Resolution:** Court found Moste's consistent, straightforward testimony compelling. Defendants' alibis were deemed self-serving without credible, disinterested witnesses.

3. **Appropriate Charge:**

- **Issue:** Whether the trial court erred in convicting for murder based on treachery and evident premeditation.

- **Resolution:** Supreme Court adjusted conviction from murder to homicide but highlighted aggravating circumstance of abuse of superior strength.

Doctrine:

- **Treachery:** Must be proven clearly and cannot be presumed. Eyewitness inability to detail attack's commencement removes basis for treachery.

- **Eyewitness Testimony:** A single credible witness's positive identification outweighs weak alibi defenses, especially family or friend-supported alibis.

- **Aggravating Circumstances:** Abuse of superior strength applied when multiple attackers overpower a lone, defenseless victim.

Class Notes:

- **Key Elements of Homicide (Article 249 of Revised Penal Code):**

- **Unlawful killing without qualifying circumstances of murder.**

- **Aggravating Circumstance:** Superior strength as guiding principle.

- **Principles:**

- **Eyewitness Testimony:** Quality over quantity.

- **Alibi Defense:** Weak compared to direct identification unless backed by disinterested testimonies.

- **Statutory References:**

- **Article 248 (Murder) and Article 249 (Homicide) of the Revised Penal Code.**

- **Credibility of Witness Principles:** People v. Ganan Jr., People v. Frago, People v. Dismuke, etc.

Historical Background:

- **Legal Context:**
- Importance of scrutinizing judicial reliability on eyewitness identifications versus alibi defenses.
- **Broader Context:**
- This case highlights the Philippine judicial system's handling of credibility issues and detailed judicial reasoning in capital offense cases.