

### Title:

People vs. Danny Delos Santos y Fernandez, G.R. No. 3551798, October 2, 1998

### Facts:

**\*\*Initial Incident:\*\***

- On the evening of November 6, 1997, Rod Flores was drinking gin with Narciso Salvador, Marvin Tablate, and Jayvee Rainier at Rainier's house in Sarmiento Homes, San Jose del Monte, Bulacan.
- At about 8:00 p.m., Marcelino De Leon approached the group to borrow Flores' cart and stood across from him.
- Suddenly, Danny Delos Santos emerged from behind Flores and stabbed him multiple times with a kitchen knife. Flores attempted to escape but was pursued and stabbed repeatedly by Delos Santos, causing his intestines to bulge from his stomach.
- De Leon, fearing for his life, hid and later reported the incident to the police.

**\*\*Prosecution Evidence:\*\***

- **\*\*Marcelino De Leon's Testimony:\*\*** Confirms the stabbing and chasing of Flores by Delos Santos.
- **\*\*Marvin Tablate's Testimony:\*\*** Corroborates De Leon's account and witnessed Flores being stabbed from behind.
- **\*\*Dr. Benito Caballero:\*\*** Conducted the autopsy, reporting 21 stab wounds, with 11 being fatal.
- **\*\*Romeo Flores:\*\*** Testified on the victim's income and expenses incurred due to his son's death.

**\*\*Defense Evidence:\*\***

- **\*\*Danny Delos Santos:\*\*** Claimed he was at his aunt's house fetching water at the time of the crime.
- **\*\*Sonny Bautista:\*\*** Supported Delos Santos' alibi, stating they were watching TV at their aunt's house until 8:30 p.m.

**\*\*Procedural History:\*\***

- **\*\*Initial Trial:\*\*** In the Regional Trial Court (RTC) of Malolos, Bulacan, Delos Santos was found guilty of murder and sentenced to death, with various indemnities ordered.
- **\*\*Appeal:\*\*** Delos Santos appealed the decision, challenging the credibility of the prosecution witnesses and the imposition of indemnities.

### Issues:

1. Whether the trial court erred in giving full faith and credence to the testimony of the prosecution witnesses.
2. Whether the trial court erred in ordering Delos Santos to indemnify the heirs of the victim with various amounts for damages.

### Court's Decision:

1. **Credibility of Witnesses:**

- The Supreme Court upheld the RTC's findings regarding witness credibility, citing that appellate courts typically defer to the trial court's assessment of witnesses' demeanor and testimonies.
- Despite minor inconsistencies in the witnesses' testimonies, the essential details remained consistent, confirming Delos Santos' actions.

2. **Credibility Versus Alibi and Denial:**

- The Court noted that alibi and denial cannot outweigh positive identification made by the prosecution witnesses.
- The physical proximity of Delos Santos' claimed location to the crime scene weakened his alibi.

3. **Motive:**

- The Court ruled that lack of motive is not sufficient to reverse a conviction when credible eyewitness testimony establishes the crime.

4. **Indemnities:**

- The Court modified the RTC's decision, reducing some of the damages while affirming others, based on the evidence provided:
  - **Death Penalty Commute:** Downgraded from death to reclusion perpetua due to lack of aggravating circumstances.
  - **Indemnity:** Affirmed the civil indemnity of P50,000.
  - **Temperate Damages:** Awarded P25,000.
  - **Moral and Exemplary Damages:** Reduced to P50,000 and P25,000 respectively.
  - **Loss of Earning Capacity:** Correctly computed and affirmed at P266,400.

### Doctrine:

- **Positive Identification Precedence:** Positive identification by credible witnesses prevails over alibi and denial.

- **Treachery in Murder:** An attack executed from behind without the victim's provocation or preparedness constitutes treachery.
- **Quantum of Proof for Damages:** Requires reasonable certainty and competent evidence to support claims for actual damages.

**Class Notes:**

- **Murder (Article 248, Revised Penal Code):** Defined as killing another person with treachery, among other circumstances, and is punishable by reclusion perpetua to death.
- **Treachery:** Any sudden and unexpected attack from behind ensuring the victim has no defense.
- **Indemnity Guidelines:** Based on established precedents and must be supported by the best obtainable evidence.
- **Credibility of Testimony:** The judiciary places significant trust in the trial court's capacity to gauge the credibility of witnesses through direct observation.

**Historical Background:**

This case occurred in a period when the Philippines was grappling with issues related to criminal accountability and the use of the death penalty. The case illustrates the transition in legal procedures detailed in the 2000 Revised Rules of Criminal Procedure, emphasizing the procedural fairness and the importance of clearly stating aggravating circumstances in informations.