

****Title:**** People of the Philippines v. Garchitorena, Pamplona, and Garcia (2010)

****Facts:****

On September 22, 1995, around 9:00 PM in Sta. Inez, Almeda Subdivision, Brgy. Dela Paz, Binan, Laguna, “balut” vendor Mauro Biay was attacked and killed. The incident was witnessed by Mauro’s sister, Dulce Borero, who testified that Jessie Garcia called Mauro over, twisted his arm behind his back, and then Joey Pamplona and Arnold Garchitorena began stabbing him. Garchitorena and Pamplona strangled and stabbed Mauro multiple times, resulting in his death. The prosecution presented three witnesses: Dulce Borero, Dr. Rolando Poblete who conducted the autopsy, and Mauro’s widow Amelia Biay who testified about the burial expenses and loss of income.

The defense disputed these events. Joey Pamplona claimed he witnessed Garchitorena stabbing Mauro once and then fled out of fear. Jessie Garcia provided an alibi, stating he was on a bus home from work at the time of the incident. Garchitorena’s defense claimed insanity due to schizophrenia and drug use. Defense witnesses, including Danilo Garados and Miguelito Gonzalgo, had varying accounts, but most confirmed Garchitorena’s involvement.

The Regional Trial Court (RTC) convicted all three accused of murder, imposing the death penalty and ordering them to pay damages to Mauro’s heirs. The Court of Appeals (CA) affirmed the decision in toto, and the case was brought to the Supreme Court (SC) for automatic review.

****Issues:****

1. Whether the testimonies, particularly of Dulce Borero, were credible.
2. Whether the trial court erred in appreciating the evidence in favor of the appellant Pamplona.
3. Whether the guilt of the accused was proven beyond reasonable doubt.
4. Whether the defense of alibi by Garcia was properly disregarded.
5. Whether Garchitorena’s defense of insanity was adequately proven.
6. Whether there was sufficient basis for conspiracy among the accused.
7. Whether the penalties and damages awarded were appropriate.

****Court’s Decision:****

The Supreme Court affirmed the CA’s decision with modifications, assessing the trial’s thorough examination of evidence and testimonies.

1. **Credibility of Testimonies:** The Court upheld the credibility of Dulce Borero's account, noting her consistent and categorical identification of the accused and rejecting the defense's claim that her narrative was implausible due to minor inconsistencies.
2. **Denial and Alibi:** The Court found no merit in Pamplona and Garcia's alibi, emphasizing that positive identification outweighs denial and alibi, which were not proven by physical impossibility to be at the crime scene.
3. **Insanity Defense:** Garchitorena's insanity claim was dismissed, as the doctor testified he had moments of lucidity and understood his actions during the crime, actions indicative of sanity, such as fleeing the crime scene.
4. **Conspiracy:** The Court found sufficient evidence of conspiracy as the actions of the accused demonstrated a coordinated effort to kill Mauro Biay.
5. **Penalties and Damages:** Modifying the trial court's decision, the Supreme Court reduced the death penalty to reclusion perpetua without parole under RA 9346, and adjusted the monetary awards:
 - Civil indemnity: P75,000
 - Moral damages: P75,000
 - Exemplary damages: P30,000
 - Temperate damages in lieu of actual damages: P25,000
 - Loss of earning capacity: P408,000
 - 6% interest on damages from date of decision until full payment

Doctrine:

1. **Positive Identification:** Positive testimony by a credible witness prevails over denials and alibis.
2. **Defense of Insanity:** Requires clear and positive evidence showing complete deprivation of reason during the crime.
3. **Conspiracy:** Can be inferred from coordinated actions showing a joint purpose in committing a crime.
4. **Superior Strength:** An aggravating circumstance applied when perpetrators take advantage of physical superiority.

Class Notes:

- **Elements of Murder:** Intent to kill, unlawful aggression, and qualifying circumstances (e.g., abuse of superior strength).

- **Insanity Defense:** Requires proof of complete deprivation of reason.
- **Conspiracy:** Inferred from collective actions.
- **Superior Strength:** Circumstance must be evident and taken advantage of by aggressors.
- **Legal Citations:**
 - Article 248, Revised Penal Code: Defines and penalizes murder.
 - RA 9346: Prohibits imposition of death penalty.
 - Article 63, Revised Penal Code: Rules for penalties with aggravating circumstances.

Historical Background:

This case (People v. Garchitorea et al.) is a significant reference in Philippine jurisprudence for the assessment of witness credibility, the application of the conspiracy doctrine, and the evaluation of defenses such as alibi and insanity. It reflects the transition in Philippine law following the abolition of the death penalty under RA 9346, modifying death sentences to reclusion perpetua.