

### Title: Ubales vs. People of the Philippines, G.R. No. 177363, October 8, 2008

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### Facts:

- **\*\*16 October 2001 to Early Hours of 17 October 2001:\*\***
- At 8:00 p.m., petitioner Angel Ubales and the deceased, Mark Santos, were drinking liquor with a group that included Jon-Jon, Solo Perez, and Jojo Santos in front of Mark's house in Manila.
- Ubales and Mark had an argument about Mark's cousin, which was seemingly resolved.
- After the carousal, which ended the next day at 1:00 a.m., Ubales and Mark went into Mark's house.
- Both men left to reportedly head to Ubales' house on J.P. Laurel Street.
  
- **\*\*17 October 2001:\*\***
- By 3:00 a.m., Eduardo Galvan, a 65-year-old balut vendor, allegedly saw an argument between Mark and Ubales, and witnessed Ubales shooting Mark in the head.
- At around 3:55 a.m., SPO1 Eduardo Ko received a report of a body at the intersection of Jose P. Laurel St. and Matienza St., San Miguel, Manila. The police recovered a .38 caliber paltik revolver with three live bullets and one empty shell nearby.
- An autopsy confirmed Mark died from a gunshot wound to the forehead.
  
- **\*\*25 October 2001:\*\***
- Laila Cherry Cruz sought police assistance to apprehend Ubales after spotting him near Malacañang.
- SPO2 Rosales Fernandez arrested Ubales without a warrant, and the latter voluntarily accompanied the officer for investigation and a medical exam.
  
- **\*\*5 November 2001:\*\***
- P/Chief Inspector Carlos Mendez received and examined the .38 caliber paltik revolver.
  
- **\*\*Trial and Evidence:\*\***
- The prosecution presented several witnesses, including Eduardo Galvan, SPO1 Ko, Laila Cherry Cruz, SPO2 Fernandez, and a forensic firearms examiner.
- Defense presented Ubales, asserting alibi, claiming he was either at home or at a friend's house during the incident.
- Other defense witnesses corroborated Ubales' account.

- Ubales' motion to demur the evidence was denied by the trial court, and the defense was directed to present evidence.

- **Trial Court Decision:**

- On 20 July 2004, Ubales found guilty of homicide and sentenced to 10 years Prison Mayor as minimum and 14 years, 8 months, and 1 day Reclusion Temporal as maximum.

- Ubales ordered to pay civil indemnity, moral damages, and actual damages.

- **Court of Appeals Decision:**

- On 30 November 2006, the Court of Appeals affirmed the conviction but added P25,000 as temperate damages.

Ubales then filed a petition for review on certiorari under Rule 45, putting forward two main issues.

**### Issues:**

1. **Whether the evidence for the prosecution proved that Ubales committed the crime charged beyond reasonable doubt.**

2. **Whether the additional award of twenty-five thousand pesos (P25,000.00) as temperate damages was in accordance with law and relevant decisions of the Supreme Court.**

**### Court's Decision:**

1. **Evidence of Guilt Beyond Reasonable Doubt:**

- The Court found inconsistencies and improbabilities in Eduardo Galvan's testimony which cast doubt on its reliability. The testimony failed to meet the test of moral certainty required for a conviction.

- The lack of corroborative evidence and ballistic examination linking the recovered gun to the crime also weakened the prosecution's case.

- Ubales' willingness to cooperate with the police and undergo medical examination highlighted a lack of flight behavior, inconsistent with guilt.

- The Supreme Court acquitted Ubales due to reasonable doubt, emphasizing the principle that it is preferable to acquit ten guilty individuals than to convict one innocent person.

2. **Temperate Damages:**

- Given the acquittal of Ubales, the discussion on temperate damages was rendered moot.

**### Doctrine:**

- **Reasonable Doubt and Credibility of Witnesses:** Testimonies must be credible in themselves and conform to common human experience. Doubts arising from witness testimonies undercut the certainty needed for conviction.
- **Preference for Acquittal in Cases of Doubt:** Legal doctrine prioritizes acquitting the accused in the presence of reasonable doubt to prevent unjust conviction.

### ### Class Notes:

- Application of the “reasonable doubt” standard in criminal trials.
- The importance of the credibility of eyewitness testimony.
- The legal principle that flight can be interpreted as evidence of guilt.
- The necessity of corroborative evidence in upholding a conviction.
- **Relevant Statute:** Rule 133, Sec. 2, of the Rules of Court - requiring moral certainty for conviction.

### ### Historical Background:

- The decision reflects ongoing judicial scrutiny of due process and evidentiary standards in Philippine criminal law. Emphasizing the protection of individual rights, the ruling upholds stringent requirements for securing a conviction, reinforcing the fundamental principle of reasonable doubt as a safeguard against wrongful imprisonment. This case highlights the judiciary’s role in rectifying potential miscarriages of justice amidst legal proceedings.