

**\*\*Title:\*\*** People of the Philippines vs. Ruben Estepano, Rodney Estepano, and Rene Estepano

**\*\*Facts:\*\***

On 16 April 1991, at around ten o'clock in the evening in Barangay IV, Himamaylan, Negros Occidental, Enrique Balinas was murdered. The principal witness for the prosecution, Florencio Tayco, testified he was with Lopito Gaudia and the victim when they encountered Dominador Estepano near the BM Trucking compound. Without warning, Rodrigo Estepano appeared and attacked Enrique with a "guinunting," a type of bolo. Subsequently, Ruben with a cane cutter, and Rodney, Dante, and Rene, each with a bolo, took turns hacking Enrique.

Ruben, Rodney, and Rene were later charged with murder along with other members of the Estepano family. Rodrigo died during the trial, and Dante was not apprehended, leading to the archiving of the case against him. Dominador was acquitted for lack of evidence. Ruben, Rodney, and Rene were found guilty.

Ruben, Rodney, and Rene appealed the verdict to the Supreme Court. They argued that:

1. The trial court improperly relied on the uncorroborated testimony of Florencio Tayco.
2. Conspiracy was erroneously inferred.
3. The guilty verdict of murder was wrongly imposed upon them.

**\*\*Issues:\*\***

1. Was the trial court's reliance on Florencio Tayco's testimony justified?
2. Was there sufficient evidence establishing the conspiracy among the accused?
3. Were the accused properly convicted of murder given the evidence presented?
4. Did the trial court err in dismissing the defense of alibi presented by the appellants?

**\*\*Court's Decision:\*\***

1. **\*\*On Testimony Credibility:\*\*** The Supreme Court upheld the trial court's assessment of Florencio Tayco's testimony, noting that witness credibility assessments are best made by the observant trial court. The Supreme Court found no justifiable reason to discard Tayco's detailed and positive identification of the assailants.
2. **\*\*On Conspiracy:\*\*** The Supreme Court found sufficient grounds to uphold the trial court's finding of conspiracy. The coordinated acts of the accused in attacking Enrique, as described, demonstrated a concerted action towards a common objective indicative of a conspiracy.

3. **On Conviction for Murder:** The conviction for murder, predicated on treachery, was upheld. The court noted the unexpected attack on Enrique as evidence of treachery, given that the manner of attack prevented any effective retaliation or defense.

4. **Rene's Acquittal:** Considering Rene's age (13 at the time) and the lack of proof demonstrating discernment of his actions, the Supreme Court acquitted Rene. The prosecution failed to rebut the presumption of non-discernment which acts as an exculpatory defense for minors under the Revised Penal Code.

5. **On Alibi:** The appellants failed to establish physical impossibility to be at the crime scene, thus rendering their defense of alibi ineffective.

**Doctrine:**

- **Credibility of Eyewitness Testimony:** Credibility determinations are primarily within the discretion of the trial court.
- **Conspiracy:** Concerted actions towards a common criminal purpose can establish conspiracy even absent direct evidence of agreement.
- **Treachery:** An unexpected attack evidencing a deliberate choice of means to prevent defense constitutes treachery, thus elevating homicide to murder.
- **Non-discernment of Minors:** Children between nine and fifteen years are presumed incapable of criminal liability unless discernment is proven.

**Class Notes:**

- **Treachery Components:** Unforeseen and swift execution ensuring no defense, deliberately chosen.
- **Conspiracy Indication:** Unity of purpose and action is vital.
- **Alibi's Weakness:** Needs both presence elsewhere and physical impossibility of being at the crime locus.
- **Philippine Penal Code Art. 12(3):** Exempts minors lacking discernment from criminal liability.

**Historical Background:**

The early 90s in the Philippines were marked by heightened criminal activities in provinces and the reinforcement of witness protection programs. This legal proceeding reflects the courts grappling with inter-familial crimes and the judicial process in small communities where testimonies form the crux of trials. This case continues to substantiate the evolving jurisprudence on juvenile justice and shared liability in the Philippines.