

Title: People of the Philippines vs. Roberto G. Campos

Facts:

On April 20, 2003, at approximately 8:00 p.m., Emeliza P. Empon was at home in Antipolo City with her boyfriend, Eric Sagun, and neighbor, Marilou Zafranco-Rea, when an armed man entered the house, seized Emeliza's cellphone from the center table, and fatally shot her in the chest before fleeing the scene. Eric and Marilou reported the incident to the police, describing the assailant as "medyo malaki katawan," or of large build.

Police received a tip that a man matching the description was in Mangahan St., Pasig City. Upon approaching the suspected man, identified as Roberto G. Campos, he attempted to flee but was subsequently apprehended with a .38 caliber firearm in his possession. Several hours later, at 3:00 a.m., Eric and Marilou identified Roberto in a police lineup as the person who robbed and killed Emeliza.

Subsequently, Roberto Campos was charged and tried before the Regional Trial Court (RTC) of Antipolo City for the complex crime of Robbery with Homicide (Criminal Case No. 03-25467). At trial, Roberto claimed an alibi, stating he was at a friend's house in Santolan, Pasig City, when arrested and alleged police coercion during interrogation.

Procedural History:

The RTC found Roberto guilty on February 9, 2017, sentencing him to reclusion perpetua and awarding damages to the victim's heirs. Roberto appealed to the Court of Appeals (CA), challenging the credibility of the prosecution witnesses and the identification process. On August 5, 2019, the CA affirmed the RTC's conviction with modifications to the damage awards.

Roberto appealed to the Supreme Court, questioning the validity of the out-of-court identification and other procedural aspects of his trial.

Issues:

1. Was the out-of-court identification of Roberto during the police lineup valid and reliable?
2. Did the trial courts err in assessing the credibility of the eyewitnesses?
3. Does Roberto's alibi hold up against the eyewitness accounts?
4. Is the non-presentation of the paraffin test result significant in establishing reasonable doubt on Roberto's guilt?

Court's Decision:

1. **Out-of-Court Identification:** The Supreme Court upheld the validity of the police lineup and the positive identification by Eric and Marilou as it met the “totality of circumstances” test. Factors such as the opportunity to view the criminal, the eyewitnesses’ focused attention, prompt identification without suggestiveness, and consistency in their testimonies supported the reliability of the identification.
2. **Credibility of Witnesses:** The Court gave deference to the RTC and the CA’s findings on the credibility of the witnesses, noting their corroborative and consistent testimonies without any indication of ill motive.
3. **Alibi and Denial:** Roberto’s defense was dismissed due to lack of corroboration and failure to prove that he was physically elsewhere when the crime occurred. His alibi and denial could not outweigh the positive identification by the eyewitnesses.
4. **Paraffin Test:** The Court found the paraffin test non-essential as the positive identification by eyewitnesses sufficiently established Roberto’s criminal responsibility. The paraffin test’s lack of accuracy and utility in proving gun firing further diminished its relevance.

Doctrine:

The case reaffirms the doctrine that the totality of the circumstances approach should be applied in determining the admissibility and reliability of out-of-court identifications. It also emphasizes the standards of credibility allocation to eyewitness testimony in criminal cases.

Class Notes:

- **Robbery with Homicide:** Elements include taking personal property through violence or intimidation; intent to gain (animus lucrandi); and commission of homicide on the occasion of robbery.
- **Identification Procedures:** Evaluate through the totality of circumstances test, including the opportunity to view, attention level, description accuracy, time lapse, certainty degree, and suggestiveness of procedure.
- **Credibility Over Alibi:** Positive, unequivocal identification by witnesses typically outweighs defenses of alibi and denial without corroboration.

Statutes:

- Revised Penal Code Article 294(1): Defines the penalty and structure for the crime of Robbery with Homicide, subject to the penalty of reclusion perpetua to death.

Historical Background:

This case is situated within the broader context of upholding due process protections in eyewitness identifications amidst concerns of wrongful convictions based on faulty or unreliable identification procedures. It reflects the evolution of legal standards toward ensuring fairness and accuracy in criminal adjudications in the Philippines.