

Title: People of the Philippines vs. Mayor Antonio L. Sanchez, et al.

Facts:

On the evening of June 28, 1993, the events of a horrific crime unfolded, led by several individuals under the direction of Mayor Antonio L. Sanchez of Calauan, Laguna. Witnesses Aurelio Centeno and Vicencio Malabanan, former co-conspirators, provided a detailed account of the crime. They were recruited by George Medialdea to abduct Eileen Sarmenta and Allan Gomez, purportedly to offer Sarmenta to the Mayor as a “gift.” With Medialdea, Centeno, Malabanan, along with Zoilo Ama, Baldwin Brion, and Luis Corcolon, they traveled in an ambulance and a Tamaraw van to U.P. Los Baños where Sarmenta and Gomez were forcefully taken.

Once abducted, they were taken to Eras Farm, owned by Mayor Sanchez. Gomez was beaten while Sarmenta was taken into the Mayor’s room where she was raped. Subsequently, Sarmenta and Gomez were driven to a sugarcane field where they were murdered. Sarmenta was gang-raped by the group, and both were later executed. Days passed before Centeno and Malabanan were arrested. They turned into state witnesses, providing pivotal testimony during the trial.

Procedurally, the case was filed at the Pasig City Regional Trial Court, Branch 70, under Judge Harriet Demetriou. After a grueling 16-month trial, Judge Demetriou found Mayor Sanchez and his cohorts guilty of seven counts of rape with homicide.

Issues:

1. Whether the appellants, including Mayor Sanchez, were guilty beyond reasonable doubt of the crimes charged.
2. The credibility of the eyewitness accounts provided by Aurelio Centeno and Vicencio Malabanan.
3. The validity of the defense of alibi and whether it was corroborated sufficiently to create reasonable doubt.
4. Whether the publicity of the trial compromised the right of the accused to a fair and impartial trial.

Court’s Decision:

1. The Supreme Court upheld the trial court’s decision, affirming that the testimonies of Centeno and Malabanan were credible, detailed, and consistent despite minor inconsistencies. The court emphasized that the trial judge’s personal observations favoring

the witnesses' demeanor and forthrightness carried significant weight.

2. The defense of alibi postulated by the mayor and others was dismissed. The court ruled that the positive identification and detailed account of the crime by credible eyewitnesses outweighed the defense of alibi, especially given its lack of strong corroboration.

3. The Supreme Court concluded that no actual bias was established due to the publicity of the trial. It reiterated that mere exposure to publicity does not automatically impair the impartiality of the trial judge, who remained directed and fair throughout.

Doctrine:

1. The trial court's evaluation of witness credibility is highly respected, given the judge's direct interaction and observation of the testimonies.
2. An alibi cannot stand against a positive identification by a credible witness.
3. Publicity, by itself, does not compromise the integrity of the judicial process unless actual bias is demonstrated.

Class Notes:

1. Credibility of Witnesses: Direct observation by the trial judge plays a pivotal role in determining credibility and is often upheld on appeal.
2. Positive Identification: Trumps alibi in the presence of detailed, consistent testimonies.
3. Prejudicial Publicity: Must demonstrate actual bias, not just potential bias, to be considered an impediment to justice.

Historical Background:

The gruesome crime of Allan Gomez and Eileen Sarmenta shocked the Philippine populace, highlighting issues of political corruption, abuse of power, and the protection of the innocent. The case became very high-profile, given the involvement of a well-known political figure, which also drew significant media coverage, reflecting a period when the Philippine judiciary was heavily scrutinized for transparency and the safeguarding of due process.