

Title:

People of the Philippines vs. Alex De Los Santos

Facts:

On April 6, 2004, in Barangay Mungo, Tuao, Cagayan, Fernando A. Catriz and Reynaldo Bayudan were unloading chickens from a Toyota Tamaraw vehicle when Alex De Los Santos suddenly appeared and attacked Catriz from behind with a bolo, causing a dislodged handle. Catriz tried to flee but was pursued by De Los Santos, who drew a “Rambo-type” knife and repeatedly stabbed him, ignoring Catriz’s pleas for mercy and continuing until Catriz was dead. De Los Santos then washed his hands at a nearby pump well and surrendered to the police shortly afterward.

During the trial, the prosecution presented Bayudan and Dr. Exuperio Yuaga, who conducted the post-mortem examination, both supporting the narrative that De Los Santos attacked Catriz without provocation. The defense claimed self-defense, alleging a prior altercation during which Catriz assaulted De Los Santos, causing him to retaliate.

The Regional Trial Court (RTC) convicted De Los Santos of murder, finding the presence of treachery, and sentenced him to reclusion perpetua. The Court of Appeals (CA) affirmed this decision.

Issues:

1. **Whether the trial court erred in not giving credence to the accused-appellant’s claim of self-defense.**
2. **Whether treachery attended the killing, qualifying it as murder.**

Court’s Decision:

Issue 1: Self-Defense

- **Evaluation of Witness Credibility:** The Supreme Court held that the trial courts are better positioned to evaluate the credibility of witnesses. The courts found Bayudan’s testimony credible, as corroborated by Dr. Yuaga’s findings.
- **Unlawful Aggression:** The accused failed to prove unlawful aggression, the primary requirement for self-defense. The physical and testimonial evidence indicated that De Los Santos initiated the attack from behind, contrary to his claim of defending from an assault by Catriz.
- **Consistency and Plausibility of Defense Account:** Discrepancies in the testimonies of the defense witnesses and the implausibility of a conveniently placed knife were noted.

Additionally, the number and nature of the wounds indicated a deliberate lethal intent rather than self-defense.

Issue 2: Treachery

- **Definition and Elements of Treachery:** Treachery involves employing means that ensure the execution of the crime without risk to the aggressor. Both elements—attack without the possibility of defense and deliberate adoption of means—were present.
- **Evidence of Treachery:** The elements of treachery were evident as De Los Santos attacked the unarmed and unsuspecting Catriz from behind and continued the assault even when Catriz pleaded for his life.

Doctrine:

- **Self-Defense:** To invoke self-defense, the burden of proof lies on the accused to show clear and convincing evidence of unlawful aggression, reasonable necessity of the means to repel it, and lack of provocation.
- **Treachery:** For treachery to qualify a killing as murder, the prosecution must demonstrate that the victim was defenseless and that the assailant employed methods to ensure the success of the attack without risk to themselves.

Class Notes:

Key Elements:

1. **Self-Defense:** (Article 11, Revised Penal Code) Requires:
 - Unlawful aggression by the victim
 - Reasonable necessity of the means to prevent or repel it
 - Lack of sufficient provocation by the accused
2. **Treachery:** (Article 14, Revised Penal Code) Requires:
 - Execution of the attack ensuring it without risk to the aggressor
 - Victim's inability to defend or retaliate

Key Statute:

- **Article 248, Revised Penal Code:** Defines and penalizes murder, modified by specific qualifying circumstances such as treachery.
- **Article 63(2), Revised Penal Code:** When penalties are indivisible and there are no aggravating/mitigating circumstances, the lesser penalty must be imposed.

Historical Background:

This case underscores the rigor with which Philippine jurisprudence examines claims of self-

defense, emphasizing the necessity for clear evidence of unlawful aggression. The courts' approach affirms their commitment to upholding judicial processes, including the rigorous evaluation of evidence and credibility of testimonies. This adherence helps in maintaining the integrity of judicial decisions, ensuring that justice is dispensed fairly based on concrete facts rather than mere allegations.