

Title: People of the Philippines vs. Fausta Gonzales, et al.

Facts:

On February 21, 1981, around 9:00 PM, Bartolome Paja, the Barangay Captain of Barangay Tipacla, Ajuy, Iloilo, was awakened by Augusto and Fausta Gonzales. Fausta allegedly admitted to killing their landlord, Lloyd Peñacerrada. Augusto still held the knife used in the killing, and Fausta was smeared with blood. Paja instructed his nephew to take them to the police. They were taken to the Municipal Hall in Poblacion, Ajuy, where they informed the police of the incident. Patrolman Salvador Centeno, the Gonzales spouses, and Paja then went back to the scene. They found the victim, Lloyd Peñacerrada, dead inside Augusto and Fausta's residence clad only in underwear, sprawled face down.

The following day, February 22, Patrolman Centeno, accompanied by a photographer, continued the investigation, and an autopsy revealed multiple fatal wounds on the victim's body. The autopsy performed at 11:20 AM showed 16 wounds, with five of them fatal.

On February 23, 1981, Augusto Gonzales surrendered to Police Corporal Ben Sazon for detention and requested to be taken to the P.C. headquarters in Sara, Iloilo. Based on the investigation, an information for murder was filed by the Provincial Fiscal of Iloilo against Augusto and Fausta Gonzales. An eye-witness named Jose Huntoria came forward later and asserted to have seen multiple accomplices in the crime. An Amended Information was filed on March 3, 1982, adding Custodio Gonzales Sr., Custodio Gonzales Jr., Nerio Gonzales, and Rogelio Lanida as co-accused.

At the trial, witnesses including Dr. Jesus Rojas, Barangay Captain Bartolome Paja, and Jose Huntoria testified. Huntoria claimed he saw the accused hacking and stabbing the victim, illuminated under the moonlight, but his testimony had uncertainties, and he only came forward eight months after the incident.

Procedural Posture:

The Regional Trial Court (RTC) convicted all accused except Rogelio Lanida who was never arrested. They were sentenced to reclusion temporal and ordered to pay indemnity plus moral damages. Custodio Gonzales Sr. appealed to the Court of Appeals, which modified his sentence to reclusion perpetua and reduced the indemnity. The Court of Appeals certified the case to the Supreme Court for review.

Issues:

1. Whether the testimony of Jose Huntoria was credible and sufficient for conviction.

2. Whether the prosecution proved the participation of Custodio Gonzales Sr. in the crime beyond reasonable doubt.

Court's Decision:

The Supreme Court scrutinized the evidence and testimonies in detail. Considering Huntoria's delayed reporting, inconsistencies, and inability to specify the actions of each accused, the Court found his testimony unreliable. The Supreme Court reasoned that there was no conclusive evidence to prove Custodio Gonzales Sr.'s direct involvement in the crime. Furthermore, the defense of alibi and the improbability under Filipino cultural traditions of involving an aging parent in violent acts weakened the prosecution's case. The Court thus acquitted Custodio Gonzales Sr., reversing the Court of Appeals' decision.

Doctrine:

The case reiterates the doctrine that criminal conviction requires proof beyond reasonable doubt. Specifically, testimonies of alleged eyewitnesses must be critically examined, especially when delayed and fraught with inconsistencies. The adherence to Filipino family culture was also considered relevant in alibi defenses.

Class Notes:

1. Criminal liability requires definitive proof of individual acts causing harm.
2. Eyewitness testimony must be prompt and consistent to hold probative value.
3. Alibi, while generally weak, may suffice where prosecution evidence fails to unequivocally place the accused at the crime scene.
4. Article 248, Revised Penal Code - definition and penalties for murder.
5. Article 4, Revised Penal Code - means by which criminal liability is incurred.
6. Article 3, Revised Penal Code - how felonies are committed including essential elements of acts or omissions punishable by law.

Historical Background:

The case took place during the early 1980s in the Philippines, amidst a socio-political landscape with significant land disputes and feudal relationships. The dynamics between landowners and tenants were often precarious, setting interactions that occasionally escalated into violent confrontations. The case illustrates the complexities of proving criminal conspiracy under such historical and cultural contexts.