

****Title: People of the Philippines vs. Arnel Balute y Villanueva****

****Facts:****

On March 22, 2002, at approximately 8:00 PM, SPO1 Raymundo B. Manaois, along with his wife Cristita and daughter Blesilda, were traversing Road 10 in Tondo, Manila in their owner-type jeepney. The vehicle stopped due to heavy traffic in a well-lit area when two men approached from either side. Arnel Balute y Villanueva (Balute), identified as one of the attackers, pointed a gun at SPO1 Manaois and demanded valuables, saying “putangina, ilabas mo!” Balute forcibly took SPO1 Manaois’s Nokia 3210 cell phone before shooting him on the left side. Despite drawing his own firearm, SPO1 Manaois could not return fire as he fell to the ground. He was rushed to Mary Johnston Hospital but succumbed to his injuries.

Balute claimed he was at work as a pedicab welder at Leticia Nicol’s shop from 8:00 AM to 10:00 PM on the incident day. His alibi was corroborated by Nicol, who implicated Leo Blaster and another individual named Intoy instead.

On November 22, 2002, an Information was filed against Balute for Robbery with Homicide under Article 294(1) of the Revised Penal Code (RPC). The Regional Trial Court (RTC) of Manila, Branch 18, found Balute guilty beyond reasonable doubt and sentenced him to reclusion perpetua without eligibility for parole. Moreover, he was ordered to pay civil indemnity, compensatory damages, and moral damages to Manaois’s heirs.

Balute appealed to the Court of Appeals (CA), which upheld his conviction on February 3, 2014, but modified the amounts of damages and deleted the compensatory damages for the mobile phone due to lack of proof of its value.

****Issues:****

1. Whether the prosecution sufficiently established the elements of Robbery with Homicide against Balute.
2. Whether the witness testimonies of Cristita and Blesilda, as relatives of the victim, were credible.
3. Whether Balute’s defense of denial and alibi held merit against the positive identification by the witnesses.
4. Whether the CA properly adjusted the awards for damages.

****Court’s Decision:****

1. ****Proof of Robbery with Homicide:**** The Supreme Court affirmed that all elements of Robbery with Homicide were present:

- The taking of SPO1 Manaois's mobile phone.
- Intention to gain.
- Use of violence or intimidation.
- Homicide resulting from or on the occasion of the robbery. The robbery was the primary motive, and the killing was incidental to it.

2. **Credibility of Witnesses:** The Court upheld the credibility of Cristita and Blesilda's testimonies, emphasizing they had no ill motive to falsely accuse Balute. Their detailed and consistent accounts outweighed the accused's denial and alibi.

3. **Denial and Alibi:** Denial and alibi, being inherently weak forms of defense especially against positive identification by unbiased witnesses, were found insufficient. Nicol's corroboration was self-serving and could not disprove the enactment of the crime.

4. **Damages Adjustments by CA:** The SC agreed with CA's modifications:

- Civil indemnity increased to P75,000.00.
- Compensatory damages for the mobile phone replaced with P140,413.53 for hospital and funeral expenses.
- All monetary awards surged with interest until full payment. The SC further adjusted moral damages to P75,000.00 and awarded P30,000.00 exemplary damages for Balute's reprehensible conduct.

Doctrine:

The special complex crime of robbery with homicide, under Article 294(1) of the RPC, necessitates:

- Taking personal property with intent to gain.
- Use of violence or intimidation.
- Homicide occurring by reason or on the occasion of robbery.

The killing need not be premeditated but must happen in connection with the robbery.

Class Notes:

- Elements of Robbery with Homicide (Art. 294(1), RPC):
 1. Taking of personal property.
 2. Intent to gain.
 3. Use of violence or intimidation.
 4. Commission of homicide by reason/occasion of robbery.
- Positive identification by unbiased witnesses outweighs denial/alibi.

- Civil and moral damages in criminal cases can be revised based on prevailing jurisprudence.

****Historical Background:****

This case provides a contextual application of Article 294(1) of the Revised Penal Code, aiming to ensure severe penalties for heinous crimes like robbery coupled with homicide. The continuous affirmation of witness credibility and the precise interpretation of legal doctrines showcase the Philippine judiciary's commitment to maintaining justice and deterring violent crimes.