

Title:

****People of the Philippines vs. Almario “Mario” Salvame****

Facts:

The case revolves around the murder of Daniel Libres, who was last seen alive with Almario Salvame and Rogelio Lebano alias “Dencio.” The crime took place on April 21, 1986, in New Corella, Davao, Philippines. Libres intended to purchase a chainsaw from Lebano, and the meeting led to the unfortunate event of his death. Salvame and Lebano were charged with murder, having allegedly conspired to kill Libres, resulting in multiple stab wounds leading to his demise.

Following the incident, both accused fled, initiating a series of events including unsuccessful police manhunts and voluntary admission by Salvame of his involvement in the crime during a drunken state in 1992. This admission led to his arrest and subsequent trial. At the trial court, Salvame was found guilty of murder qualified by evident premeditation and sentenced to Reclusion Perpetua.

Issues:

The primary legal issue revolves around the credibility and sufficiency of circumstantial evidence to convict Salvame of murder, considering:

1. The last seen doctrine, which implicates individuals last seen with the victim as responsible for the crime in absence of direct evidence.
2. The evaluation of eyewitness testimony regarding the identification of Salvame with the victim shortly before the murder.
3. The relevance of flight as an indicator of guilt.

Court’s Decision:

The Supreme Court affirmed the trial court’s decision, holding that the circumstantial evidence presented was sufficient for conviction. The decision meticulously discussed how each piece of evidence, including the last sighting of the victim with Salvame and Lebano, Salvame’s flight following the crime, and his eventual confession, interlocked to form an unbroken chain pointing to his guilt beyond a reasonable doubt.

Doctrine:

The case reiterated several important legal doctrines:

1. ****Circumstantial Evidence Conviction****: Conviction can be based on circumstantial evidence if it fulfills the criteria of comprising more than one circumstance, the facts from

which inferences are derived are proven, and the combined circumstances lead to a conviction beyond a reasonable doubt.

2. **Flight as Indication of Guilt**: Flight of an accused can be considered evidence of consciousness of guilt.

Class Notes:

- **Circumstantial Evidence**: Must consist of more than one circumstance, the facts must be proven, and all circumstances together should lead to a conviction beyond reasonable doubt.

- **Last Seen Doctrine**: The presence of the accused with the victim just before or at the time of the crime is significant in establishing both opportunity and guilt.

- **Flight as Evidence**: An accused's attempt to flee or evade arrest can be used as indicia of guilt.

- **Eyewitness Testimony**: The credibility of eyewitness testimony is crucial, especially when direct evidence is lacking. Testimonies of witnesses with no ill motives are given substantial weight.

Historical Background:

This case illustrates the Philippines' legal stance on the sufficiency of circumstantial evidence in securing a murder conviction. It underscores the importance of a comprehensive judicial examination of all available evidence to ensure fairness and justice in the absence of direct witness accounts of the crime. The ruling also emphasizes the judiciary's reliance on corroborative testimonies and behaviors (such as flight) that indicate consciousness of guilt, reflecting the procedural diligence required in criminal cases.