

Title:

People of the Philippines vs. Elroswell Manzano y Brebonera @ Boy Ulo

Facts:

On April 10, 1995, in Valenzuela, Metro Manila, Elroswell Manzano y Brebonera, without any justifiable cause and with treachery, evident premeditation, and deliberate intent to kill, shot Ernesto Kasilag y Arwino, causing his death. Following the filing of the information by Valenzuela City Assistant Prosecutor Magno T. Pablo, Jr., and the subsequent arrest of Manzano, a trial ensued. Federico Acero, a 14-year-old eyewitness, provided a detailed account of the incident. Despite presenting a defense of denial and alibi, Manzano was convicted of murder by the Regional Trial Court, Branch 171, Valenzuela, Metro Manila. Manzano appealed the decision, challenging the credibility of Acero and contesting the absence of corroborative witnesses and the evidence regarding the murder weapon.

Issues:

1. Whether the sole eyewitness testimony was credible and sufficient for conviction.
2. The validity of Manzano's defense of denial and alibi against positive identification.
3. The applicability of treachery in qualifying the killing as murder.
4. The assessment and award of damages.

Court's Decision:

The Supreme Court affirmed with modification the trial court's decision, finding Manzano guilty beyond reasonable doubt of murder. The Court found Federico Acero's testimony credible and pointed out that the quality of testimony over the number of witnesses establishes the truth. The Court dismissed Manzano's alibi, noting it was not physically impossible for him to be at the crime scene. Treachery was identified as Manzano attacked unexpectedly from behind, making it impossible for Kasilag to defend himself. Damages for loss of earning capacity, death indemnity, and moral damages were awarded to the victim's heirs.

Doctrine:

The case reiterated that the credibility of a single eyewitness can suffice for conviction if it is categorical and straightforward. It also confirmed that treachery qualifies killing to murder when the mode of attack deprives the victim of a chance to defend himself.

Class Notes:

- ****Eyewitness Testimony:**** Its quality, rather than quantity, determines the truthfulness

and sufficiency for conviction.

- **Positive Identification Over Denial and Alibi:** Positive identification by a credible witness prevails over the defendant's denial and alibi, especially when the latter isn't substantiated by convincing evidence.
- **Treachery (Alevosia):** An unexpected attack, especially from behind, qualifies killing as murder because it ensures the victim has no defense or opportunity to retaliate.
- **Damages:** Death indemnity and moral damages can be awarded without need for specific proof of moral suffering or pecuniary loss. Loss of earning capacity is calculated based on a formula considering the victim's potential earnings.

Historical Background:

This case illustrates the Philippine judicial system's handling of murder cases, emphasizing the value of eyewitness testimony and the criteria for determining treachery. It underscores the Supreme Court's commitment to upholding justice by meticulously evaluating the evidence and testimonies presented during trials.