

****Title**:** People of the Philippines v. Ronald Palema y Vargas, Rufel Palmea y Bautista, Lyndon Saldua y Quezon, and Virgo Grengia

****Facts**:** On November 10, 2007, at approximately 11:05 p.m., in Calamba Town Plaza, Barangay 6, Calamba City, the accused Ronald Palema, Rufel Palmea, Lyndon Saldua, and Virgo Grengia, along with Lester Ladra, Edwin Manzanero, and Marvin Marqueses, were charged with robbery with homicide for assaulting and stealing from Enicasio Depante y Rosales. The incident resulted in Depante's death due to stabbing. Despite their plea of not guilty, the evidence presented by the prosecution established their involvement in the crime. Throughout the trial, Ladra changed his plea to guilty and testified against the appellants, asserting their participation in the robbery and the homicide. The Regional Trial Court convicted the appellants of robbery with homicide, a decision later affirmed by the Court of Appeals.

****Issues**:**

1. Did the Court of Appeals err in affirming the conviction of the accused for the crime of robbery with homicide?
2. Was the acquittal of accused Marvin Marqueses proper?

****Court's Decision**:**

1. ****On the Conviction for Robbery with Homicide**:** The Supreme Court upheld the conviction, emphasizing the fundamental principle that robbery with homicide is committed when a homicide is perpetrated by reason or on the occasion of the robbery. The intent to rob coupled with the resulting homicide, regardless of whether it occurred before, during, or after the robbery, substantiates the charge. The coordinated attack led by Palema and Palmea, followed by Saldua and Grengia, directly indicated their collective intent to rob Enicasio Depante, leading to Depante's murder. Their simultaneous actions demonstrated a clear unity of purpose, fulfilling the legal criteria for conspiracy in the commission of robbery with homicide. Additionally, the Court dismissed the appellants' claims and arguments, highlighting the credible testimonies from the prosecution witnesses and Ladra's confessions that corroborated their participation and intent.
2. ****On the Acquittal of Marvin Marqueses**:** The Supreme Court found that Marqueses was never arraigned, with no evidence of his participation in the incident. Despite being charged, the lack of an arraignment and subsequent legal proceedings against him led the Court to vacate the Regional Trial Court's order for his acquittal. The Court noted this procedural oversight as a violation of due process, rendering previous proceedings involving Marqueses void.

****Doctrine**:**

- In robbery with homicide cases, the original criminal design must primarily involve robbery, with homicide being incidental and subsidiary. The offense stands as a special complex crime where the homicide, occurring before, during, or after the robbery, escalates the robbery to this more severe classification. The existence of a conspiracy among perpetrators solidifies their collective liability for the crime committed.

****Class Notes**:**

- ****Robbery with Homicide****: A special complex crime where the intent to rob precedes the act of homicide. The homicide may occur before, during, or after the robbery, but its commission elevates the crime to robbery with homicide, punishable under Article 294 of the Revised Penal Code.

- ****Conspiracy****: Established when two or more persons agree to commit a felony and decide to commit it. Conspiracy requires a showing of a common purpose and plan in executing the crime.

- ****Due Process in Criminal Arraignments****: Essential for informing the accused of the charges against them and ensuring they understand the allegations and potential consequences. The failure to arraign violates constitutional due process rights, rendering subsequent legal proceedings void.

****Historical Background**:**

This case reflects the Philippine legal framework's handling of crimes involving robbery with violence, emphasizing the crucial aspect of original criminal intent and the interplay between individual and collective actions leading to a crime. It underscores the importance of procedural due process, particularly arraignment, in ensuring fair treatment under the law.