

Title: People of the Philippines vs. Willy Manalili y Bolisay and Danilo Reyes y Marnila

Facts:

On July 27, 1990, simultaneous Informations were filed against Willy Manalili and Danilo Reyes for attempted robbery, multiple murder, and shooting and wounding in Isabela. The first case charged them with attempted robbery in a Ballesteros Liner bus, where an exchange of gunfire occurred between the robbers and a military passenger, resulting in deaths and injuries. The second case involved the killing of three individuals (Alfredo Tango, Sonny Quintua, and Nestor Agustin), attributing their deaths to gunshot wounds inflicted by the accused, who were in illegal possession of firearms. The third Information charged the accused with shooting and wounding three other individuals without causing their deaths, due to timely medical assistance. The accused pleaded not guilty and, following a joint trial, were convicted of attempted robbery with homicide, sentenced to reclusion perpetua, and ordered to pay damages, but were acquitted of qualified illegal possession of firearms used in multiple murder.

Issues:

1. Whether the trial court erred in convicting the accused of the special complex crime of attempted robbery with homicide despite not being charged with this offense in any of the Informations.
2. Whether the allegation in the Information for attempted robbery that one of the robbers was killed suffices to convict the appellants of attempted robbery with homicide.
3. Whether the accused can be convicted of charges not specifically mentioned but included in the allegations of the Information filed against them.
4. Whether the appellants' defense of alibi was sufficient to overturn the positive identification by prosecution witnesses.

Court's Decision:

The Supreme Court modified the trial court's decision. It held that the appellants could not be convicted of the special complex crime of attempted robbery with homicide, as they were not properly charged with this offense. However, based on the evidence presented, they were found guilty of attempted robbery (first case) and double murder (second case) but acquitted in the third case due to insufficient evidence of multiple frustrated murder. The defense of alibi was rejected due to the positive identification of the appellants as the perpetrators.

Doctrine:

An accused cannot be convicted of a crime not charged in the Information unless it is necessarily included in the charge or unless they fail to object to a duplicitous information before arraignment. Positive identification trumps the defense of alibi.

Class Notes:

- In criminal law, an accused's constitutional right to be informed of the nature and cause of accusation against them is fundamental for a fair trial.
- A charge for a complex crime requires specific allegations within the Information to warrant a conviction for such a crime.
- Positive identification of the accused by witnesses is a strong basis for conviction, significantly outweighing the defense of alibi.
- Duplicitous charges in a single Information, if not contested before arraignment, can result in a conviction for as many crimes as there are charges, provided they are proven during the trial.

Historical Background:

This case illustrates the procedural and substantive principles in the prosecution of complex crimes within the Philippine criminal justice system, highlighting the importance of precise charges and the sufficiency of evidence, especially in cases involving multiple accused and various crimes committed in a single incident.