

Title:

People of the Philippines vs. Randy Belonio y Landas, G.R. No. 144013, 473 Phil. 637 (2001)

Facts:

On January 6, 2000, in Talisay City, Negros Occidental, during the wake of Jennifer Carampatana's grandmother, the victim Ramy Tamayo, Jennifer's cousin, was fatally stabbed by Randy Belonio, the appellant. Ramy, while buying cigarettes from a nearby store, was bumped by Randy, who then gave him a hard look. Shortly after, Randy asked Ramy for his cigarette lighter, engaged in brief conversation, and then left, only to return a few minutes later dressed in long sleeves. Without warning, Randy stabbed Ramy in the chest with a hidden dagger. Jennifer witnessed the incident and sought help, but Ramy succumbed to his injuries caused by the stab wound, which penetrated his heart.

Dr. Raul V. Pama, Jr. conducted an autopsy, finding that the fatal wound was a stabbed wound located around the fourth intercostal space and penetrating the heart. Randy was arrested near the barangay hall after attempting to flee and hide.

Randy's defense was insanity, supported by Dr. Antonio Gauzon, who argued that Randy had chronic undifferentiated schizophrenia, potentially exacerbated by substance abuse. However, the prosecution presented Dr. Ester Regina Servando, who found Randy manipulative, evasive, and without psychotic features at the time of psychological evaluation.

The Regional Trial Court (RTC) of Negros Occidental (Branch 50) convicted Randy Belonio of murder with the aggravating circumstances of treachery and recidivism, sentencing him to death.

Issues:

1. **Whether the trial court erred in not appreciating the exempting circumstance of insanity favoring the accused-appellant.**
2. **Whether the penalty and damages imposed were proper.**

Court's Decision:

1. Insanity Defense:

The court upheld the presumption of sanity and found that the evidence presented by Randy Belonio was insufficient to prove insanity at the time of the killing. For insanity to exempt a person from criminal liability, there must be clear evidence of complete deprivation of reason and intelligence during the commission of the crime. Randy's acts before, during,

and after the stabbing, such as conversing with the victim, deliberately obtaining a weapon, and fleeing, indicated awareness and control, negating the insanity defense. The Court found Dr. Servando's detailed and unbiased testimony more credible than Dr. Gauzon's.

****2. Penalty and Damages:****

The Court affirmed the death sentence as there were no mitigating circumstances to offset the aggravating circumstances of treachery and recidivism. The awards for damages were modified:

- ****Civil indemnity**** was affirmed at P50,000.00.
- ****Compensatory damages**** for loss of earning capacity were increased to P1,362,545.00.
- ****Moral damages**** were reduced to P50,000.00.
- ****Actual damages**** of P3,629.70 was deleted and replaced by ****temperate damages**** of P25,000.00.
- ****Exemplary damages**** of P25,000.00 was added due to the aggravating circumstance of recidivism.

Doctrine:

1. ****Presumption of Sanity:**** There is a legal presumption that an individual acts with free will and intelligence.
2. ****Burden of Proof in Insanity Defense:**** The defendant must prove insanity at the time of the criminal act, showing complete deprivation of intelligence and ability to discern right from wrong.
3. ****Treachery:**** For treachery to be a qualifying circumstance, the attack must be deliberate and ensure the victim had no opportunity to defend or retaliate.
4. ****Recidivism:**** Recidivism is an aggravating circumstance if the accused was previously convicted of a similar offense by final judgment.

Class Notes:

****Key Elements in Criminal Law:****

- ****Insanity Defense:**** Requires complete deprivation of intelligence during the commission of the crime.
- ****Treachery:**** Attack must be unexpected and deliberate with no chance for the victim to defend.
- ****Recidivism:**** Being previously convicted by final judgment of a similar offense adds severity to the sentence.

****Relevant Statutes:****

- **Article 12, Revised Penal Code:** Establishes insanity as an exempting circumstance.
- **Article 14, par. 9, Revised Penal Code:** Defines recidivism.
- **Article 63, par. 1, Revised Penal Code:** Directing the imposition of the greater penalty when aggravating circumstances outweigh mitigating ones.

Historical Background:

This case occurred during a time when the Philippine justice system strictly enforced the death penalty for heinous crimes, including murder qualified by aggravating circumstances such as treachery and recidivism. The emphasis was on ensuring that justice was served to uphold societal order and deter severe crimes. The rigid stance on the insanity defense underscored the importance of substantial, unequivocal proof to override the presumption of sanity.

The case also reflects the judiciary's stringent analysis of both medical and factual evidence, maintaining a high standard for claims of mental incapacity. The decision showcases the balance pursued by the courts in weighing expert testimonies, underlying the necessity for thorough and impartial evaluations in the judicial process.