

Title:

People v. Patalin, Jr., et al, G.R. No. 110878, 370 Phil. 200 (1999)

Facts:

****Initial Criminal Incident:****

- On the evening of August 11, 1984, at around 7:30 PM in Barangay Lumanay, Lambunao, Iloilo, Alfonso Patalin, Jr. called out to Reynaldo Aliman from outside his fenced perimeter and requested entry.
- Accompanied by Alex Mijaque and two others, Patalin was let in by Reynaldo.
- Upon entry, Patalin shone a flashlight on Reynaldo, allowing Mijaque to hack Reynaldo twice, causing serious injuries.
- Corazon Aliman and Josephine Belisario witnessed the incident from their balcony, whereupon Mijaque forced his way into their home, stole properties worth ₱700, and subsequently dragged Corazon and Josephine to a nearby house.

****Criminal Case No. 18305 (Robbery with Multiple Rape):****

- Patalin, Mijaque, Ras, and their accomplices invaded Jesusa Carcillar's house, robbing the household of valuables worth ₱6,500 and sexually assaulting the following victims:
 - Juliana Carcillar (raped twice by Mijaque)
 - Rogelia Carcillar (raped by Mijaque and unknown accomplice)
 - Josephine Belisario (raped by Mijaque)
 - Perpetua Carcillar (raped by Ras after Patalin's failed attempt).

****Procedural Posture:****

- The accused-appellants were arraigned with pleas of "not guilty."
- The trial court rendered a joint judgment convicting:
 - Patalin and Mijaque for robbery with physical injuries in Criminal Case No. 18376.
 - Patalin, Mijaque, and Ras for robbery with multiple rape in Criminal Case No. 18305.

Issues:

1. ****Identification and Credibility:****

- Were the accused-appellants correctly identified by the prosecution witnesses?

2. ****Legitimacy of Arrests:****

- Should the conviction of Patalin and Mijaque be invalidated due to their arrest without a warrant?

3. ****Appropriate Penalty:****

- Is the imposition of the death penalty on the accused-appellants valid given the ratification

of the 1987 Constitution, which abolished the death penalty?

Court's Decision:

Identification and Credibility:

- The Court upheld the trial court's assessment of the witnesses' credibility, noting their direct interaction with the assailants and absence of ill motive.
- Positive identification by multiple witnesses during a protracted and well-lit encounter was deemed credible.

Legitimacy of Arrests:

- The objection regarding the warrantless arrest was dismissed as it was not raised prior to the plea; therefore, any defect was deemed waived.

Appropriate Penalty:

- The death penalty initially imposed was reduced to reclusion perpetua, consistent with the abolition of the death penalty in the 1987 Constitution.
- Revised awards included indemnification for each count of rape and other forms of damages due to the severity of the crimes.

Doctrine:

1. **Assessment of Witness Credibility:**

- The trial court's first-hand evaluation of witness testimonies carries significant weight unless proven otherwise.

2. **Warrantless Arrests:**

- Objections to warrantless arrests must be raised before arraignment; failure to do so constitutes waiver of the issue.

3. **Retroactive Application of Favorable Penal Laws:**

- Article 22 of the Revised Penal Code mandates retroactive application of laws that favor the accused, barring subsequent reimposition without express legislative intention for retroactivity.

Class Notes:

- **Key Concepts:**

- Positive identification and credibility assessment.
- Procedural waiver related to warrantless arrests.
- Retroactive application of favorable penal provisions (Article 22, Revised Penal Code).

- **Statutory Provisions:**

- **Article 22, Revised Penal Code**: “Penal laws shall have a retroactive effect insofar as they favor the person guilty of a felony, who is not a habitual criminal...”
- **Sec. 19 (1), Article III, 1987 Constitution**: Abolished the death penalty with potential for future legislative reinstatement.
- **Application**:
 - Positive ID in a crime with multiple perpetrators must be detailed and corroborated.
 - Legal objections regarding arrest procedures must be timely.
 - Favorable penal laws, upon ratification, immediately apply to ongoing cases offering the same protections prior to actual imposition of penalties.

Historical Background:

- **Contextual Background**:
 - The 1987 Philippine Constitution abolished the death penalty after the Marcos regime’s fall, reflecting a shift towards more humane criminal justice policies. The restoration in 1994 indicated a legislative response to escalating heinous crimes, balanced against constitutional mandates involving penal reforms.