

Title:

People of the Philippines vs. Liberato “Dukduk” Solamillo and Julian Solamillo

Facts:

****Chronology and Step-by-step Events:****

- ****March 2, 1994:****

- Afternoon: Liberato Solamillo visits his brother, Julian, at Liberty Bakery in Isabela, Basilan.

- 5:00 p.m. - 6:10 p.m.: Aleli Guiroy, daughter of the bakery owner, Alexander Guiroy, sees the suspects at the bakery.

- Evening: Altercation erupts resulting in Alexander Guiroy being fatally attacked by Eddie Trumata and Edgardo Ebarle.

- Post-attack: The bakery is ransacked, and Julian Solamillo allegedly takes P995 from the loot.

- ****March 3, 1994:****

- Morning: Aleli Guiroy returns to the bakery, finds the doors locked, and discovers her father’s body with the assistance of relatives and police.

- Investigation: Dr. Teresita Dans confirms multiple wounds caused by sharp and blunt instruments.

- ****March 4, 1994:****

- Edgardo Ebarle is apprehended by Lamitan police and turns over vital information about the incident to Emmanuel Guiroy and SPO4 Pedro Oreta.

- ****March 6, 1994:****

- Arrest of Liberato Solamillo in Zamboanga City while found in possession of the victim’s watch and wallet.

- Surrender: Julian Solamillo surrenders to police in Bacong, Dumaguete.

****Procedural Posture:****

- ****March 23, 1994:**** Information filed against Liberato “Dukduk” Solamillo, Julian Solamillo, Edgardo Ebarle, and Eddie Trumata for robbery with homicide.

- ****Arraignment:****

- Liberato Solamillo and Edgardo Ebarle plead not guilty.

- Julian Solamillo pleads guilty but later claims the plea was under duress.
- **Trial Court Proceedings:** Prosecution presents several witnesses including relatives of the victim and investigating officers. Defense provides an alternative narrative of events.

Issues:

1. **Whether the evidence presented was sufficient to establish guilt beyond a reasonable doubt for the crime of robbery with homicide.**
2. **Whether the trial court correctly appreciated aggravating circumstances in determining the penalties.**
3. **Whether Julian Solamillo's plea of guilty should affect his conviction.**
4. **Entitlement and accuracy of the damages awarded by the trial court.**

Court's Decision:

Resolution of Legal Issues:

1. **Sufficiency of Evidence:**

- The Supreme Court upheld the trial court's finding, based on a chain of circumstantial evidence that was consistent and incompatible with any innocent explanation. This included the presence of the accused at the crime scene, their flight from the scene, and possession of the victim's belongings.

2. **Aggravating Circumstances:**

- The trial court erred in applying the circumstances of a band, evident premeditation, deliberate cruelty, and treachery. The Supreme Court clarified that all perpetrators must be armed for the crime to constitute a band, and there was no clear premeditation or deliberate intent to increase victim suffering. Treachery could not apply as robbery with homicide is primarily an offense against property.

3. **Effect of Julian Solamillo's Plea:**

- Julian's guilty plea was not unequivocally withdrawn. The Supreme Court affirmed that even if Julian's original plea was improvident, his conviction was validly based on independent evidence beyond his plea.

4. **Damages:**

- Adjustments were made to damages: P50,000.00 each for civil indemnity and moral damages, and P25,000.00 for temperate damages. Exemplary damages and attorney's fees

were deleted due to lack of aggravating circumstances.

****Final Ruling:****

Appellants sentenced to reclusion perpetua, required to pay civil indemnity, moral damages, and temperate damages to the heirs of Alexander Guiroy.

Doctrine:

The case reiterated principles of how circumstantial evidence suffices for conviction and clarified the prerequisites for certain aggravating circumstances. It also set forth guidelines on how damages should be awarded and computed.

Class Notes:

- ****Elements of Robbery with Homicide:****

1. Taking of personal property.
2. Use of violence or intimidation during the taking.
3. Intent to gain.
4. Homicide occurs on the occasion or because of the robbery.

- ****Aggravating Circumstances:****

- Requirement for "by a band": More than three persons must be armed.
- Evident premeditation needs clear timing and deliberation evidence.
- Cruelty involves intention to increase suffering.

- ****Key Statutory Provisions:****

- Article 294, Revised Penal Code: Penalty for robbery with homicide is reclusion perpetua to death.
- Section 3(j), Rule 131, Revised Rules on Evidence: Presumption of possession equaling guilt.

Historical Background:

This case highlights enhanced judicial scrutiny in criminal liability context, demonstrating the rigors of trial court evidence evaluation and clarifying the application of legal principles.