

Title

People of the Philippines vs. Aubrey Enriquez Soria

Facts

Initial Incident:

- **Date and Time:** February 22, 2012, around 2:06 a.m.
- **Scene:** The house of Mariano Perez Parcon, Jr. and his family in Holy Family Village, Barangay Banilad, Cebu City.
- **Event:** Fire broke out in the house, leading to total destruction and the death of house helper, Cornelia O. Tagalog.

Circumstances and Witnesses:

- **Mariano Parcon, Jr.:** Woken by smoke, attempted to put out the fire but had to evacuate his family through a window fire exit. Observed that Cornelia did not respond to his calls.
- **Neighbor - Eduardo Umandak:** Encountered appellant Aubrey Enriquez Soria early in the morning with two bags, one of which contained items belonging to Cornelia. Found her suspicious and reported to Parcon.

Evidence Collection:

- **Items Recovered from Appellant:** Gray shoulder bag and its contents, including items identified as belonging to Cornelia, stolen cellular phones of Parcon.
- **Testimonies:**
 - **Juanito Octe:** Testified about the ownership of stolen items.
 - **SPO4 Rey Cuyos:** Involved in arrest; testified about the investigation and evidence seized.
 - **Erlyn Arizo, Guamittos Logrono, Ryan Christopher Sorote:** Provided supplementary information confirming circumstances of the incident.

Appellant's Defense:

- **Narration:** Claimed she escaped the house the previous night with Cornelia's help due to her sick children; denied setting the fire, stated Cornelia was to retrieve her things.

Procedural Posture:

1. **RTC Judgment (November 16, 2015):** Found appellant guilty of Qualified Arson, sentencing her to reclusion perpetua and ordering payment of damages.
2. **CA Appeal (April 30, 2019):** Affirmed RTC's decision with modifications, including

additional moral damages and interest on awarded amounts.

Issues

1. **Whether the prosecution established appellant's guilt beyond reasonable doubt through circumstantial evidence.**
2. **Admissibility and credibility of Sorote's testimony (news reporter) regarding appellant's extrajudicial confession.**
3. **Appropriate penalties and damages awarded to the heirs of Cornelia Tagalog and Mariano Parcon, Jr.**

Court's Decision

1. **Circumstantial Evidence:**
 - Affirmed the sufficiency of circumstantial evidence.
 - Established logical chain linking appellant to the intentional burning, theft, and subsequent actions; corroborated by witnesses.
2. **Admissibility of Confession:**
 - Confession given freely and spontaneously despite being within police custody.
 - Sorote was not acting under police control during the interview. Appellant's detailed admission was credible.
3. **Penalties and Damages:**
 - Increased damages awarded from P50,000 to P75,000 for both civil indemnity and moral damages.
 - Added exemplary damages for Cornelia's heirs and Parcon.
 - Imposed interest rate of 6% per annum until fully paid.

Doctrine

1. **Circumstantial Evidence:**
 - When direct evidence is lacking, a conviction can be sustained via circumstantial evidence if it creates an unbroken chain pointing to the accused's guilt beyond reasonable doubt.
 - Refer to Rule 133, Section 5 of the Revised Rules on Evidence.
2. **Extrajudicial Confession:**
 - Validity hinges on voluntariness and absence of coercion, not solely on detention context (People v. Dacanay).

3. **P.D. No. 1613, Sections 1 and 5:**

- Intentional burning of an inhabited house with resultant death constitutes qualified arson with penalties ranging from reclusion perpetua to death.

Class Notes

- **Key Elements of Qualified Arson:**

- Intentional burning of an inhabited structure.
- Resulting in death, leading to reclusion perpetua to death (P.D. No. 1613).

- **Circumstantial Evidence Criteria:**

- Multiple consistent circumstances.
- Proven facts leading to a conviction beyond a reasonable doubt.
- Exclusion of other rational hypotheses except guilt.

- **Admissibility of Confessions:**

- Volunteerism and detail consistency are crucial for admissibility.
- Not automatically inadmissible due to detention context.

Historical Background

- **The Case Context:** Enhances understanding of the stringent penalties for crimes endangering lives and property under Presidential Decree No. 1613 (New Arson Law) established in the post-Martial Law era to deter severe arson cases amidst urban safety improvements and property protection norms.