

Title:

People of the Philippines vs. Armando Dionaldo y Ebron, Renato Dionaldo y Ebron, Mariano Gariguez, Jr. y Ramos, and Rodolfo Larido y Ebron

Facts:

- **Background Information:** The case involves the accused-appellants Armando Dionaldo y Ebron, Renato Dionaldo y Ebron, Mariano Gariguez, Jr. y Ramos, and Rodolfo Larido y Ebron who were charged with the special complex crime of Kidnapping for Ransom with Homicide.
- **Incident:** The appellants kidnapped Edwin Navarro and demanded a ransom. During the course of the crime, Navarro was killed.
- **Lower Court Proceedings:** The Regional Trial Court of Caloocan City, Branch 129 found them guilty and sentenced them to reclusion perpetua.
- **Court of Appeals Procedure:** The case was appealed to the Court of Appeals (CA-G.R. CR-H.C. No. 02888), which affirmed the trial court's decision on February 15, 2013.
- **Supreme Court Procedure:** Further appealing to the Supreme Court, the resolution dated July 23, 2014, found the appellants guilty beyond reasonable doubt and sentenced them to reclusion perpetua without eligibility for parole. They were also ordered to pay civil indemnity, moral damages, and exemplary damages, with six percent annual interest.

Issues:

1. **Whether the accused were guilty of the special complex crime of Kidnapping for Ransom with Homicide.**
2. **Whether the death of one of the accused (Renato Dionaldo y Ebron) before the promulgation of the Supreme Court's resolution affects criminal liability.**

Court's Decision:

- **Issue 1 - Guilt of the Accused:**
- **Ruling:** The Supreme Court affirmed the Court of Appeals' decision but modified to specify that all accused are guilty of Kidnapping for Ransom with Homicide. The Court found substantial evidence proving the elements of both kidnapping for ransom and homicide.
- **Resolution:** Each appellant was sentenced to reclusion perpetua without the possibility of parole and was ordered to pay P100,000.00 each as civil indemnity, moral damages, and exemplary damages.
- **Issue 2 - Effect of Renato's Death:**

- **Ruling:** Renato Dionaldo y Ebron's death prior to the promulgation of the judgment by the Supreme Court rendered the decision against him null and void. According to Article 89 of the Revised Penal Code, the death of an appellant extinguishes the criminal liability as well as civil liability arising from the offense if death occurs before final judgment.
- **Resolution:** The case against Renato Dionaldo y Ebron was dismissed, setting aside the earlier resolutions as they pertain to him.

Doctrine:

1. **Article 89, Revised Penal Code:** Criminal liability is totally extinguished upon the death of the accused before a final judgment, including civil liability arising from the offense.
2. **Substantial Evidence Standard:** Affirming a conviction requires that all elements of the crime be proven beyond reasonable doubt.

Class Notes:

- **Key Concepts:**
- **Special Complex Crime:** Merging of distinct crimes into one composite crime, such as Kidnapping for Ransom with Homicide.
- **Reclusion Perpetua:** A penalty of imprisonment for at least thirty years, without eligibility for parole (in this context).
- **Article 89, Revised Penal Code:** Specifies instances where criminal liability is extinguished, including the death of the convict.
- **Statutory Provisions:**
- **Article 89, Revised Penal Code:** "Criminal liability is totally extinguished by the death of the convict as to the personal penalties and as to pecuniary penalties, only when the death of the offender occurs before final judgment."
- **Application:**
- The Court determined that under Article 89, RPC, Renato's death before judgment extinguished both his criminal and civil liability.

Historical Background:

This case illustrates the interplay of procedural and substantive criminal law in a setting where the accused faced a grave accusation of kidnapping resulting in death. It serves as an important precedent in understanding the legal effects of a defendant's demise prior to the final adjudication, emphasizing the principle that justice must account for facts occurring throughout the judicial process, including the life status of the accused during appeals.