

**PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. REYNALDO ARENA Y LOSANDE A.K.A. “DAGUL”;
ACCUSED-APPELLANT.**

G.R. No. 271191, June 02, 2026

Ponente: LEONEN, SAJ.

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LEONEN, SAJ.:

Human memory is almost never entirely reliable.[1] It is inherently fallible, susceptible to suggestion and distortion.[2] Thus, in appreciating eyewitness identification, courts shall consider the totality of circumstances surrounding the case.

This Court resolves a Notice of Appeal[3] assailing the Decision[4] of the Court of Appeals, which affirmed with modifications the Decision[5] of the Regional Trial Court convicting Reynaldo Arena y Losande, also known as "Dagul," (Arena) of robbery with homicide.

Arena was charged with the crime of robbery with homicide. The Information dated December 21, 2010 reads:

That on or about the 29th day of August 2010 in the City of Legazpi, Philippines, and within the jurisdiction of this Honorable Court, the above-named accused, conspiring and confederating with one person whose real name and present whereabouts is (sic) still unknown and both of them mutually helping and aiding [one] another, with intent of gain and by means of violence and intimidation, wilfully, unlawfully and feloniously, by reason of or on occasion of robbery, with intent to kill, shoot and fire at ABEL V. MOROTA, thereby inflicting upon the latter mortal wounds which were the direct and immediate cause of his death, to the damage and prejudice of the said ABEL V. MOROTA, and/or his heirs, and thereafter the above-named accused, with intent of gain, and by means of violence and intimidation wilfully, unlawfully and feloniously, poke the gun to JOSEPH MALASA y MADRIÑAN[6] and take, steal and carry away from him money amounting to [PHP] 11,000.00, without his knowledge and consent, to his damage and prejudice.

CONTRARY TO LAW.[7]

On arraignment, Arena pleaded not guilty. Trial ensued.[8]

The prosecution presented as witnesses Joseph Malasa (Malasa); Lolita Morota (Lolita); Dr. James Margallo Belgira; Dr. Nicanor Manzano; Police Inspector Gregorio M. Villanueva; Senior Police Officer (SPO) 4 Jaime Glenn B. Llasos; Police Officer (PO) 3 Jordan Razal, Jr.; PO2 Allan Madelar; PO2 Julius Amaranto; and PO2 Ruel De Ocampo.[9]

According to the testimonies for the prosecution, Malasa was the caretaker and cook at Banjo's Chicken Inato. Meanwhile, Abel Morota (Morota) served as the store driver. On August 29, 2010, around 8:25 p.m., the store was about to close. Malasa and Morota stood outside facing each other. When Malasa turned his back from Morota, he heard a gunshot, which prompted him to face the direction where it came from. He saw Morota fall down. Morota was able to stand up again, but a man wearing a hat, a black jacket with a hood, and a handkerchief

below the nose to the chin, pointed a gun at Morota's forehead and shot him. Morota fell to the ground, bloodied.[10]

The assailant then approached Malasa and pointed the gun at Malasa's forehead. Malasa raised his hands behind his neck and crouched down as the assailant frisked him. The assailant took money from Malasa's pocket amounting to PHP 11,000.00. Malasa was able to look closely at the assailant during this time. Malasa noted the assailant's squint eye. The assailant backed away with the gun still pointing at Malasa. The assailant fled the scene on a motorcycle driven by another person.[11]

Morota was rushed to the hospital where he was declared dead on arrival.[12]

A month after the incident, Lolita, Morota's wife, heard of a carnapping incident in a nearby town. She requested photos of the suspects and showed them to Malasa. Malasa recognized Arena as the assailant. They proceeded to the police station and Malasa confirmed that Arena was the person who shot Morota. He again identified Arena in open court.[13]

Further, the bullets recovered from Morota's body were matched to a gun issued to Arena and admittedly in his possession on the day of the crime.[14]

Arena testified in his defense. He confirmed that the gun recovered upon his arrest was issued to him by the Armed Forces of the Philippines as a Citizen Armed Force Geographical Unit member. He alleged that he was being used as a scapegoat by officials who wanted the case to be resolved quickly to protect their reputation.[15]

In a Judgment[16] dated August 15, 2019, the Regional Trial Court found Arena guilty beyond reasonable doubt of robbery with homicide:

WHEREFORE, there being moral certainty on the identity of the accused Reynaldo Arena y Losande alias "Dagul" as the perpetrator of the crime charged in the Information for ROBBERY WITH HOMICIDE defined and penalized under Article 293 in relation to Article 294(1) of the Revised Penal Code, the Court henceforth adjudged him GUILTY beyond reasonable doubt of such charge, thereby sentencing him to RECLUSION PERPETUA with all the accessory penalties according to existing law; and to pay the heirs of the deceased Abel V. Morota the following sums, to wit: [PHP] 75,000.00 as civil indemnity ex-delicto, [PHP] 75,000.00 for moral damages, [PHP] 30,000.00 as exemplary damages, [PHP] 27,500.00 as actual damages plus the costs of the suit. However, no pronouncement is herein made on the claim for lost income for failure of the prosecution to substantiate the same.[17]

Arena appealed his conviction before the Court of Appeals.[18] In the Brief for the Accused-Appellant[19] dated March 6, 2020, Arena argued that the manner by which he was identified as the perpetrator was "highly suspicious." [20] To Arena, the process leading to his identification was tainted with "impermissible suggestions." [21] In *People v. Pineda*, [22] police officers must present to the witness a series of photographs in a way which does not suggest the identity of the suspect. [23] Instead, the wife of the victim, an untrained civilian, conducted the photographic identification. Arena asserted that this constitutes impermissible suggestion. [24] Arena pointed out that for 23 days before this, Malasa did not communicate his recollection of the perpetrator's identity to the police. [25]

Arena further argued that it is incredible that Malasa could have seen the perpetrator's face despite the coverings Malasa described. [26]

Meanwhile, in the Appellee's Brief [27] dated March 31, 2021, the Office of the Solicitor General, on behalf of the People of the Philippines, maintained that the court correctly found that the prosecution established all the elements of the crime proving Arena's guilt beyond reasonable doubt. [28] Between Arena's denial and the

prosecution's eyewitness testimony, the latter prevails.[29] The Office of the Solicitor General further argued that the award of exemplary damages should be increased to PHP 100,000.00 in accordance with *People v. Jugueta*.[30]

The Court of Appeals promulgated a Decision[31] dated August 18, 2023 denying Arena's appeal:

WHEREFORE, premises considered, the present appeal is hereby DENIED. The Judgment dated 15 August 2019 of the Regional Trial Court of Legazpi City, Branch 2 in Criminal Case No. 11806 is AFFIRMED with the following modifications: (1) that the award for exemplary damages is increased to the amount of Seventy Five Thousand Pesos ([PHP] 75,000.00); and (2) legal interest at the rate of 6% per annum is imposed on the civil indemnity, moral and exemplary damages awarded to the heirs of Abel V. Morota, which shall commence from the date of finality of this decision until fully paid.

SO ORDERED.[32]

Arena filed a Notice of Appeal[33] dated September 19, 2023 which was given due course by the Court of Appeals in its Resolution[34] dated November 3, 2023.

In its Resolution[35] dated April 11, 2024, this Court noted the records of this case forwarded by the Court of Appeals, required the parties to file their respective supplemental briefs, and required the Bureau of Corrections to confirm the confinement of accused-appellant. This Court later noted the Letter[36] dated June 14, 2024 from the Bureau of Corrections in compliance with the Resolution.[37] This Court likewise noted that both the Office of the Solicitor General and accused-appellant manifested that they would no longer file supplemental briefs.[38]

This Court resolves the issue of whether the Court of Appeals erred in affirming accused-appellant Reynaldo Arena y Losande a.k.a. "Dagul's conviction of robbery with homicide. Specifically, this Court determines whether accused-appellant was wrongfully identified as the perpetrator of the crime.

I

The appeal is unmeritorious.

This Court sustains accused-appellant's conviction for robbery with homicide as penalized under Articles 293 and 294(1) of the Revised Penal Code, which provides:

ARTICLE 293. Who are guilty of robbery. — Any person who, with intent to gain, shall take any personal property belonging to another, by means of violence against or intimidation of any person, or using force upon anything, shall be guilty of robbery.

ARTICLE 294. Robbery with violence against or intimidation of persons. — Penalties. — Any person guilty of robbery with the use of violence against or intimidation of any person shall suffer:

1. The penalty of reclusion perpetua to death, when by reason or on occasion of the robbery, the crime of homicide shall have been committed.

....

Taking these provisions together, the elements of the special complex crime of robbery with homicide are: (1) the taking of personal property is committed with violence or intimidation against persons; (2) the property taken belongs to another; (3) the taking is *animo lucrandi*; and (4) by reason of the robbery or on the occasion thereof, homicide is committed.[39]

As the Court of Appeals found, the killing of Morota and the taking of restaurant profits amounting to PHP 11,000.00 are undisputed.[40] The *animo lucrandi* or the intent to gain was inferred from the following facts: the

crime was committed when the restaurant was closing to ensure that the revenue was at its maximum; Morota was shot to isolate Malasa who has custody of the cash; and, after taking the money, accused-appellant fled the crime scene.[41]

The Court now turns to the question of the identity of the accused, the basis of which accused-appellant assails as "severely tainted with impermissible suggestions"[42] and "incredible and belies belief." [43]

II

Human memory is almost never entirely reliable.[44] It is inherently fallible, susceptible to suggestion and distortion.[45] Yet, it has long been taken for granted that people are bound to remember extraordinary occurrences.[46] In *People v. Sartagoda*: [47]

It is the most natural reaction for victims of criminal violence to strive to see the looks and faces of their assailants and observe the manner in which the crime was committed. Most often the face of the assailant and body movements thereof, create a lasting impression which cannot easily be erased from their memory.[48] (Citation omitted)

Meanwhile, a proliferation of studies prove otherwise.[49] Indeed, this Court has acknowledged the frailty of human memory. In *People v. Teehankee, Jr.*, [50] the Court said:

Identification testimony has at least three components. First, witnessing a crime, whether as a victim or a bystander, involves perception of an event actually occurring. Second, the witness must memorize details of the event. Third, the witness must be able to recall and communicate accurately. Dangers of unreliability in eyewitness testimony arise at each of these three stages, for whenever people attempt to acquire, retain, and retrieve information accurately, they are limited by normal human fallibilities and suggestive influences.[51] (Citation omitted)

On one hand, the mind is more likely to commit emotionally charged experiences to long-term memory.[52] On the other hand, the mind may also forget devastating events for its own survival.[53] That either may hold true on a case-to-case basis should put the court on notice against declaring sweeping doctrines favoring one. Not all eyewitness testimonies are reliable, nor are all false. Rather than relying on sweeping approbations, courts must appreciate the totality of circumstances in the identification of perpetrators of crimes.[54]

The totality of circumstances test considers the following factors:

(1) the witness' opportunity to view the criminal at the time of the crime; (2) the witness' degree of attention at that time; (3) the accuracy of any prior description given by the witness; (4) the level of certainty demonstrated by the witness at the identification; (5) the length of time between the crime and the identification; and, (6) the suggestiveness of the identification procedure.[55]

The Court expounded in *People v. Nuñez*: [56]

A witness'[s] credibility is ascertained by considering the first two factors, i.e., the witness'[s] opportunity to view the malefactor at the time of the crime and the witness'[s] degree of attention at that time, based on conditions of visibility and the extent of time, little and fleeting as it may have been, for the witness to be exposed to the perpetrators, peruse their features, and ascertain their identity.

....

The degree of a witness'[s] attentiveness is the result of many factors, among others: exposure time, frequency of exposure, the criminal incident's degree of violence, the witness'[s] stress levels and expectations, and the witness'[s] activity during the commission of the crime.

The degree of the crime's violence affects a witness'[s] stress levels. A focal point of psychological studies has been the effect of the presence of a weapon on a witness'[s] attentiveness[:]

To not consider a weapon's effect on eyewitness performance is to ignore relevant information. The weapon effect does reliably occur, particularly in crimes of short duration in which a threatening weapon is visible. Identification accuracy and feature accuracy of eyewitnesses are likely to be affected, although, as previous research has noted . . . there is not necessarily a concordance between the two.

....

Apart from the witness'[s] opportunity to view the perpetrator during the commission of the crime and the witness'[s] degree of attention at that time, the accuracy of any prior description given by the witness is equally vital. Logically, a witness'[s] credibility is enhanced by the extent to which his or her initial description of the perpetrator matches the actual appearance of the person ultimately prosecuted for the offense.

....

The totality of circumstances test also requires a consideration of the degree of certainty demonstrated by the witness at the moment of identification. What is most critical here is the initial identification made by the witness during investigation and case build-up, not identification during trial.

A witness'[s] certainty is tested in court during cross-examination. In several instances, this Court has considered a witness'[s] straight and candid recollection of the incident, undiminished by the rigors of cross-examination as an indicator of credibility.

Still, certainty on the witness stand is by no means conclusive. By the time a witness takes the stand, [they] shall have likely made narrations to investigators, to responding police or barangay officers, to the public prosecutor, to any possible private prosecutors, to the families of the victims, other sympathizers, and even to the media. The witness, then, may have established certainty, not because of a foolproof cognitive perception and recollection of events but because of consistent reinforcement borne by becoming an experienced narrator. Repeated narrations before different audiences may also prepare a witness for the same kind of scrutiny that [they] will encounter during cross-examination. Again, what is more crucial is certainty at the onset or on initial identification, not in a relatively belated stage of criminal proceedings.

The totality of circumstances test also requires a consideration of the length of time between the crime and the identification made by the witness. "[P]eople are less accurate and complete in their eyewitness accounts after a long retention interval than after a short one." Ideally then, a prosecution witness must identify the suspect immediately after the incident[.]

....

Equally jeopardizing is a witness'[s] interactions with other individuals involved in the event. As noted by cognitive psychologist Elizabeth F. Loftus, "post-event information can not only enhance existing memories but also change a witness's memory and even cause nonexistent details to become incorporated into a previously acquired memory."

Thus, the totality of circumstances test also requires a consideration of the suggestiveness of the identification procedure undergone by a witness. Both verbal and non-verbal information might become inappropriate cues or suggestions to a witness[.][57] (Citations omitted)

Further to these six circumstances, *People v. Pineda*[58] listed 12 danger signals of erroneous identification:

(1)

the witness originally stated that [they] could not identify anyone;

(2)

the identifying witness knew the accused before the crime, but made no accusation against [them] when questioned by the police;

(3)

a serious discrepancy exists between the identifying witness'[s] original description and the actual description of the accused;

(4)

before identifying the accused at the trial, the witness erroneously identified some other person;

(5)

other witnesses to the crime fail to identify the accused;

(6)

before trial, the witness sees the accused but fails to identify [them];

(7)

before the commission of the crime, the witness had limited opportunity to see the accused;

(8)

the witness and the person identified are of different racial groups;

(9)

during [their] original observation of the perpetrator of the crime, the witness was unaware that a crime was involved;

(10)

a considerable time elapsed between the witness'[s] view of the criminal and [their] identification of the accused;

(11)

several persons committed the crime; and

(12)

the witness fails to make a positive trial identification.[59]

As applied in this case, the totality of circumstances and the absence of nearly all the danger signals in Pineda support the reliability of the eyewitness Malasa.

First, Malasa was beside Morota when Morota was shot. While his back was turned when the first shot was fired, he faced Morota and accused-appellant when accused-appellant shot Morota for a second time. Malasa was also a mere arm's length from accused-appellant as accused-appellant searched Malasa's body for cash. During this time, Morota had a direct view of accused-appellant's face under the lights outside the restaurant.[60]

Second, Malasa witnessed the crime as it happened. He faced Morota and accused-appellant precisely to see where the gunshot came from and watched as accused-appellant fired another shot. Malasa's focus remained on accused-appellant while the latter frisked him. Malasa noted then accused-appellant's distinct squint eye.[61]

While there is no record of a police report where Malasa gave a description of the assailant, neither is there record of him being asked to describe the physical traits of the assailant. There is also no record of him stating that he cannot recall what the assailant looked like. Thus, there is no point of reference to determine the accuracy of any prior description given by Malasa.

Meanwhile, both the Regional Trial Court and the Court of Appeals accorded credibility to Malasa's testimony due to the level of certainty demonstrated by Malasa at the identification.[62]

Further, the length of time that has lapsed between the crime and the identification was only 23 days. As the Court of Appeals pointed out, this Court has previously ruled that the intervening period of 26 days is acceptable.[63]

On the matter of suggestiveness, Malasa does not appear to have been unduly influenced in his eyewitness identification. Under regular circumstances, the police, not the victim's widow, should have presented the pictures of potential suspects to Malasa. Nevertheless, she presented several photographs to Malasa and not just that of accused-appellant.[64] Indeed, the Court ruled in *People v. Sabangan*[65] that subsequent in-court identification may cure out-of-court identification tainted with irregularity.[66] As the lower courts found, Malasa made a positive and categorical identification of accused-appellant.[67]

Finally, Malasa's eyewitness testimony is supported by physical evidence. According to Malasa's narration, Morota was shot twice. This is consistent with the findings of the medico-legal.[68] Moreover, the bullets recovered from Morota's head wounds were found to have been fired from a weapon issued to accused-appellant as a member of the Citizen Armed Force Geographical Unit. By accused-appellant's own admission, the weapon was in his possession at the time of the incident.[69]

As for the danger signals in Pineda, only one is present. That is, before the commission of the crime, the witness had limited opportunity to see the accused. However, the presence of this fact alone does 'not preclude the correct identification of the accused. Weighed against the rest of the facts established in the case, the totality of circumstances support the reliability of Malasa's eyewitness identification of accused-appellant as the perpetrator of the crime of robbery with homicide. Taken with the physical evidence linking accused-appellant to the crime, the prosecution dispelled reasonable doubt that accused-appellant committed robbery with homicide.

Robbery with homicide is punished with reclusion perpetua to death. Thus, the Court upholds the penalty imposed by the Court of Appeals, as well as the damages awarded consistent with jurisprudence.

ACCORDINGLY, the appeal is DISMISSED. The August 18, 2023 Decision of the Court of Appeals in C.A.-G.R. CR-HC No. 13485 is AFFIRMED. Accused-appellant Reynaldo Arena y Losande, also known as a.k.a. "Dagul", is found GUILTY beyond reasonable doubt of robbery with homicide punished under Article 293 in relation to Article 294(1) of the Revised Penal Code. He is sentenced to suffer the penalty of reclusion perpetua. He is DIRECTED to pay the heirs of the victim, Abel V. Morota, the following amounts: PHP 75,000.00 for civil indemnity; PHP 75,000.00 for moral damages; PHP 75,000.00 for exemplary damages; and PHP 27,500.00 for actual damages.

These monetary awards shall earn 6% interest per annum from finality of this Decision until fully paid.

SO ORDERED.

Lazaro-Javier, Kho, Jr., and Villanueva, JJ., concur.

Lopez,[*] J., on leave but left a vote.

[*] On leave but left a concurring vote.

[1] JULIA SHAW, THE MEMORY ILLUSION: REMEMBERING, FORGETTING, AND THE SCIENCE OF FALSE MEMORY 93 (2016).

[2] People v. Velasquez, G.R. No. 274074, August 18, 2025 [Per SAJ Leonen, Second Division].

[3] Rollo, pp. 3-4.

[4] Id. at 9-22. The August 18, 2023 Decision in C.A.-G.R. CR-HC No. 13485 was penned by Associate Justice Michael P. Ong, and concurred in by Associate Justices Ramon R. Garcia and Selma Palacio Alaras of the Special Sixth Division, Court of Appeals, Manila.

[5] Id. at 25-56. The August 15, 2019 Judgment in Criminal Case No. 11806 was penned by Acting Presiding Judge Ignacio C. Barcillano, Jr. of Branch 2, Regional Trial Court, Legazpi City.

[6] Spelled "Madriana" in some parts of the rollo.

[7] Rollo, p. 25.

[8] Id. at 10.

[9] Id.

[10] Id.

[11] Id. at 10-11.

[12] Id. at 11.

[13] Id. at 14, 19.

[14] Id. at 20.

[15] Id. at 12.

[16] Id. at 25-56.

[17] Id. at 55.

[18] CA rollo, p. 24.

[19] Id. at 61-80.

[20] Id. at 63-71.

[21] Id. at 69.

[22] 473 Phil. 517 (2004) [Per J. Carpio, En Banc].

[23] Id. at 540.

[24] CA rollo, p. 69.

[25] Id. at 70.

[26] Id. at 71-72.

[27] Id. at 126-139.

[28] Id. at 132-134. See 783 Phil. 806 (2016) [Per J. Peralta, En Banc].

[29] Id. at 134-135.

[30] Id. at 136.

[31] Rollo, pp. 9-22.

[32] Id. at 21-22.

[33] Id. at 3-4.

[34] Id. at 7.

[35] Id. at 57-58.

[36] Id. at 59.

[37] Id. at 57-58.

[38] Id. at 67-68, 72.

[39] *People v. Ebet*, 649 Phil. 181, 188-189 (2010) [Per J. Peralta, Second Division], citing *People v. De Jesus*, 473 Phil. 405 (2004) [Per Curiam, En Banc].

[40] Rollo, p. 21.

[41] Id.

[42] CA rollo, p. 69.

[43] Id.

[44] JULIA SHAW, *THE MEMORY ILLUSION: REMEMBERING, FORGETTING AND THE SCIENCE OF FALSE MEMORY* 93 (2016)

[45] *People v. Velasquez*, G.R. No. 274074, August 18, 2025 [Per SAJ Leonen, Second Division].

[46] *People v. Sanchez*, 318 Phil. 547, 557 (1995) [Per J. Kapunan, First Division].

[47] 293 Phil. 259 (1993) [Per J. Campos, Jr., Second Division].

[48] *Id.* at 266.

[49] See Deborah Davis and Elizabeth F. Loftus, *Dangers of Eyewitnesses for the Innocent: Learning from the Past and Projecting into the Age of Social Media*, 46 *NEW ENG. L. REV.* 769, 769 (2012); Sandra Guerra Thompson, *Daubert Gatekeeping for Eyewitness Identifications*, 65 *S.M.U. L. REV.* 593, 596 (2012); and Nicholas A. Kahn-Fogel, *The Promises and Pitfalls of State Eyewitness Identification Reforms*, 104 *KY. L. J.* 99 (2016).

[50] 319 Phil. 128 (1995) [Per J. Puno, Second Division].

[51] *Id.* at 179.

[52] Tony W. Buchanan, *Retrieval of Emotional Memories*, *PSYCHOLOGICAL BULLETIN*, 133(5):761-779 (2007).

[53] Yoram Yovell, Yair Bannett, Arie Y. Shalev, *Amnesia for Traumatic Events among Recent Survivors: A Pilot Study*, *CMS SPECTR.* Sep;8(9):676-80, 683-5 (2003).

[54] *People v. Nuñez*, 819 Phil. 406, 426 (2017) [Per J. Leonen, Third Division].

[55] *People v. Teehankee, Jr.*, 319 Phil. 128, 180 (1995) [Per J. Puno, Second Division], citing *Neil v. Biggers*, 409 US 188 (1973); *Manson v. Brathwaite*, 432 US 98 (1977); *ROLANDO V. DEL CARMEN, CRIMINAL PROCEDURE: LAW AND PRACTICE* 346 (3rd ed., 1994)

[56] 819 Phil. 406 (2017) [Per J. Leonen, Third Division].

[57] *Id.* at 423-428.

[58] 473 Phil. 517 (2004) [Per J. Carpio, En Banc].

[59] *Id.* at 547-548, citing *PATRICK M. WALL, EYE-WITNESS IDENTIFICATION IN CRIMINAL CASES* 90-130 (1965).

[60] *Rollo*, p. 17.

[61] *Id.* at 18.

[62] *Id.* at 15, 19.

[63] *Id.* at 15.

[64] *Id.* at 14.

[65] 723 Phil. 591 (2013) [Per J. Leonardo-De Castro, First Division].

[66] *Id.* at 614.

[67] *Rollo*, p. 19.

[68] *Id.* at 11, 20.

[69] *Id.* at 20.

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