

Title: People of the Philippines v. Alfonso Badon, Arnold Arellano, and Nilo Cafino

Facts:

On June 17, 1983, at approximately 8:00 PM in Barangay Cabangahan, Siaton, Negros Oriental, Edwin Gomez was attacked and killed by Alfonso Badon, Arnold Arellano, and Nilo Cafino. Gomez, a bus conductor, had been shot by Restituto Arellano (Arnold's father and Alfonso's stepfather) and sought help from his neighbor, Demetrio Macayan, Sr. Edwin tried to reach the barangay captain's house for assistance. However, while arrangements for transport to the hospital were underway, Alfonso, Arnold, and Nilo arrived at the scene. Alfonso initially attempted to stab Edwin, who managed to evade the first attack. When Edwin tried to escape, Nilo and Arnold shot him with a .38 caliber pistol, and Alfonso subsequently stabbed him multiple times. Edwin suffered from multiple hacking wounds, stab wounds, and bullet wounds that led to his death. His death was confirmed by the municipal health officer with a certificate citing hemorrhagic shock due to the inflicted injuries.

Demetrio Macayan and Crispin Encontad, witnesses for the prosecution, identified the accused as the attackers. The police investigated, leading to the filing of an information against the accused for murder on August 11, 1983. Nilo Cafino remained at large; therefore, Alfonso and Arnold were tried separately. They both pleaded not guilty during arraignment. The trial concluded on July 16, 1996, with their conviction of murder.

Issues:

1. Whether the conviction of Alfonso Badon and Arnold Arellano was supported by evidence beyond reasonable doubt.
2. Whether the trial judge's decision is valid despite not having presided over the entire trial.
3. Whether the defenses of alibi and denial raised by the accused are credible and sufficient.
4. Whether the crime committed was attended by the qualifying circumstance of treachery or abuse of superior strength.

Court's Decision:

1. The Supreme Court affirmed the conviction of Alfonso Badon and Arnold Arellano. The Court found compelling evidence presented by the prosecution, including positive identification by the witnesses, which was sufficient to establish guilt beyond reasonable doubt. The purported inconsistencies in the witness testimonies were found to be concerning minor details and did not affect the consistency of testimony regarding the

principal occurrence and identification of assailants.

2. The Court ruled that a decision is valid even if the judge rendering it did not preside over the entire trial, as long as the decision was based on the evidence presented, including the stenographic notes. The Court emphasized that the trial judge conducted a meticulous review of the records, ensuring a just decision was reached.

3. The defense of alibi was deemed weak and insufficient to counter the direct testimony of the prosecution witnesses. The alleged distance between the crime scene and the location of the accused was too minimal to support their alibi, especially in the face of positive identification.

4. The Court found that although treachery was not established, the aggravating circumstance of abuse of superior strength was present. The assailants were armed and acted with collective force against an unarmed victim, qualifying the crime as murder.

Doctrine:

The case reiterated that for treachery to be considered, it must be present at the onset of the attack. The decision also emphasized that abuse of superior strength is established when several aggressors armed with weapons attack an unarmed victim. Moreover, a judge's decision is valid if based on comprehensive records, even if they did not hear the entire trial.

Class Notes:

1. Elements of a crime: Identification of the assailants, presence of qualifying or aggravating circumstances.
2. Credibility of witnesses: Consistent identification and testimony regarding the main facts are crucial.
3. Defense of alibi: Must demonstrate physical impossibility to be at the crime scene.
4. Treachery vs. abuse of superior strength: Treachery requires a surprising and unanticipated attack; abuse of superior strength involves using more power than necessary to overcome the victim.

Historical Background:

This case arises from a time in the Philippines when addressing violent crimes, especially those involving coordinated attacks, involved strict evidential scrutiny. The case exemplifies the evolution of handling testimonies despite inconsistencies in minor details and reinforced the judicial principle that positive identification by credible witnesses can overcome weak

defenses like denial and alibi. Cases like this highlight the intricacies involved in qualifying certain types of homicide as murder, particularly in situations involving abuse of power or force.