

Title: People of the Philippines v. Benjamin Aniñon

Facts:

On the evening of September 12, 1963, during a fiesta in Barrio Balayong, Pamplona, Negros Oriental, Cesar Agustin was fatally attacked. According to the prosecution's charge, Benjamin Aniñon and Policarpio Saycon conspired to murder Agustin with intent, premeditation, and treachery using a dagger and a piece of wood to strike the victim, causing severe injuries leading to his death. Aniñon and Saycon both pleaded not guilty. During the trial, Saycon was discharged to become a state witness, testifying that Aniñon stabbed Agustin. Testimonies from witnesses, including Lauro Ibalig and Saycon, asserted Aniñon's involvement. Dr. Antonio R. Trasmonte verified the wounds' severity, noting the various injuries that contributed to Agustin's death. The trial court convicted Aniñon of murder, sentencing him to reclusion perpetua.

Aniñon appealed to the Supreme Court, challenging several aspects of the trial court's proceedings, including Saycon's discharge and the credibility and weight of the testimonies against him.

Issues:

1. Was the trial court's discharge of Policarpio Saycon as a state witness proper under the law?
2. Did the trial court erroneously give credence to the prosecution's testimonies, notably those of Lauro Ibalig and Policarpio Saycon?
3. Was it legally and factually justifiable for the trial court to find Benjamin Aniñon responsible for the injuries leading to Cesar Agustin's death?
4. Did the court err in convicting Aniñon of murder, and was he instead guilty of a lesser crime such as homicide?

Court's Decision:

1. The Supreme Court found no procedural error in the timing of the discharge of Saycon under Rule 119 of the Revised Rules of Court. However, it noted Saycon's discharge could have been challenged for lack of absolute necessity and failure to show no other evidence was available for the prosecution. Such procedural misstep did not, however, invalidate Saycon's testimony nor affect Aniñon's conviction.
2. The Court held that minor inconsistencies in testimonies did not affect their credibility, as both Lauro Ibalig and Policarpio Saycon consistently identified Aniñon as the assailant. The

testimonies were reconciled since the store and the house where witnesses claimed the attack occurred were located in the same structure.

3. The Supreme Court corroborated the evidence supporting Aniñon's culpability through both medical evidence and the positive identification by witnesses.

4. The Court reversed the murder conviction, determining that treachery, which qualifies a killing as murder, was not present beyond reasonable doubt. The Court found that the mere suddenness of the attack was insufficient to indicate treachery. Therefore, the crime committed was homicide, not murder. Consequently, Aniñon's sentence was modified to a range of prision mayor to reclusion temporal.

Doctrine:

The Supreme Court reiterated that for treachery to qualify a killing as murder, it must be proven that the means of execution were deliberately chosen to ensure the crime's commission without risk from any defense the victim might make. Sudden attacks, without further proof of specific intent to insure execution, do not in themselves constitute treachery.

Class Notes:

- Treachery requires proof of a deliberate act ensuring execution without risk to the offender.
- Discharge of a co-accused under Rule 119 must satisfy certain requisites: necessity of testimony, absence of other evidence, corroborative material points, lesser guilt, and no conviction of moral turpitude crimes.
- Alibi is weak against positive identification unless physical impossibility of presence is proven.

Historical Background:

The case, deriving from a political gathering amidst a local election period, showcases common issues faced during such electoral events in mid-20th century rural Philippines. The prosecution and judicial methods reflect the evolution of legal standards and procedural safeguards in handling criminal cases involving multiple accused and the use of state witnesses.