

Title: People of the Philippines vs. Angelino Yanson

Facts:

On May 12, 1991, Carlito Magan was fatally stabbed multiple times in Jordan, Guimaras, after drinking whisky at a local store with Elmo Galfo, Angelino Yanson (appellant), and Rolando Salcedo. Following an altercation on their way home, Galfo witnessed appellant stabbing Magan from behind. Despite attempts to assist Magan, Galfo ran for his own safety when Yanson and Salcedo approached him threateningly. Magan succumbed to eight stab wounds, two of which were fatal, as determined by Dr. Jabasa, the Provincial Health Officer.

Yanson and Salcedo were charged with murder. On October 8, 1991, both pled not guilty. The trial commenced, with Yanson denying involvement and citing an alibi that he was at Salcedo's house during the incident.

Procedural Posture:

The Regional Trial Court (RTC) found Yanson guilty of murder, based significantly on Galfo's testimony, appreciating the presence of treachery, and acquitted Salcedo, doubting Galfo's ability to identify him accurately under the circumstances. Yanson was sentenced to reclusion perpetua and ordered to pay damages to Magan's heirs. A motion for reconsideration by Yanson was denied.

Yanson appealed the verdict to the Court of Appeals (CA). The CA upheld the RTC's decision, affirming Yanson's guilt based on Galfo's credible identification of him and the presence of treachery in the crime, but modified the damages awarded.

Issues:

1. Whether Galfo's identification of Yanson as the assailant can be deemed credible, despite him not mentioning Yanson's name in his sworn police statement.
2. Whether the presence of treachery as a qualifying circumstance was correctly appreciated in the murder charge.
3. The validity of the award for damages and whether adjustments were necessary.

Court's Decision:

1. Galfo's Identification: The Supreme Court affirmed the CA's decision, recognizing Galfo's consistent in-court identification of Yanson as credible despite not naming Yanson in his sworn statement. The Court ruled discrepancies between affidavit and testimony as typical due to the nature of affidavits.

2. Treachery: The Court upheld the finding of treachery, wherein the assault was sudden and unexpected, rendering Magan defenseless. His unawareness and the manner of attack aligned with the elements necessary to establish treachery.

3. Damages: The Court modified the award, granting P75,000 as civil indemnity, affirming P50,000 for moral damages, replacing actual damages with P25,000 for temperate damages, adding P30,000 for exemplary damages due to the presence of qualifying circumstances, and maintaining P20,000 for attorney's fees. Interest at a rate of 6% per annum was applied to all damage awards, effective from the decision's finality until full payment.

#### Doctrine:

The ruling reiterated the standards for assessing witness credibility, particularly in crime scenes, underscoring that a consistent, positive identification made in open court carries more weight than earlier sworn statements. Further, it confirmed the application of treachery in murder charges based on the element of surprise rendering a victim incapable of self-defense.

#### Class Notes:

1. Murder under Article 248 of the Revised Penal Code carries a penalty of reclusion perpetua to death, modified by Article 63 if no other aggravating or mitigating circumstances are present.
2. Treachery involves a deliberate, surprise attack ensuring the offender's safety, crucial for qualifying homicide to murder.
3. Civil indemnity and moral damages are awarded without the need for further proof beyond the conviction—current jurisprudence pegs civil indemnity in murder at P75,000.

#### Historical Background:

The case sheds light on procedural nuances when reviewing lower court decisions, particularly the treatment and resolution of evidentiary discrepancies in criminal cases. It also exemplifies the shift towards a more victim-compensatory jurisprudence, reflecting socio-cultural values in victims' reparations.