

Title:

People of the Philippines vs. Francisco Zafra, Feliciano Braganza, and Cresencio Velasco

Facts:

On November 21, 1991, around 10:30 PM, Francisco Zafra drove an Isuzu passenger-type jeepney (Plate No. DUK-382), owned by Efren Cardinal, with Feliciano Braganza, Cresencio Velasco, and three unidentified persons onboard. They were stopped by SPO1 Reynaldo Sunan and PO3 Mario Villa in Turbina, Calamba due to erratic driving and the jeepney's lack of lights. When questioned, Zafra said they were headed to Batangas. Subsequently, three of his companions fled as the police approached. The police detained Zafra, Braganza, and Velasco, interrogating them further; they admitted to killing the jeepney driver, Candido Diongco, and dumping his body in Calamba.

Authorities took the appellants and found Diongco's body, later returning the jeepney to Efren Cardinal's wife. The appellants were arraigned and tried, ultimately found guilty of carnapping and murder by the trial court on February 26, 1993. They were sentenced to life imprisonment and ordered to pay damages to Diongco's heirs and Efren Cardinal. The appellants appealed the decision, contesting the evidentiary basis of their conviction.

Issues:

1. Did the trial court err in convicting the accused based on the police's testimony and disregarding the defendants' explanation?
2. Was the conviction of the accused supported by proper and reliable circumstantial evidence?
3. Did the trial court have jurisdiction over the case given the locations of the incidents?
4. Did the trial court appropriately establish the existence of conspiracy among the accused?

Court's Decision:

1. **Credibility of Testimonies:**
- The Supreme Court upheld that the trial court was correct in finding the testimonies of the police officers more credible. The accused failed to provide a satisfactory explanation for their possession of the stolen jeepney; as per established jurisprudence (People vs. Newman, People vs. Repuela), possession of stolen property implies guilt unless satisfactorily explained.
2. **Circumstantial Evidence:**

- The Court decided that the circumstantial evidence was strong. The accused were found with the stolen jeepney; they knew where Diongco's body was dumped, linking them directly to the crime, supporting their conviction for carnapping and murder.

3. **Jurisdiction:**

- The Supreme Court affirmed that the trial court had proper jurisdiction under Paragraph (b), Section 14, Rule 110 of the Rules of Court. Since the crime took place over multiple jurisdictions and the appellants were apprehended in Calamba, the action was validly instituted there.

4. **Conspiracy:**

- The Court found sufficient evidence of conspiracy. Presence together in the stolen vehicle and acts leading up to the apprehension indicated a concerted effort. Previous jurisprudence (People vs. Villanueva, People vs. Pinzon) allows for conspiracy to be inferred from coordinated actions.

Doctrine:

1. **Possession of Stolen Property:**

- The rule that a possessor of stolen property is presumed guilty unless satisfactorily explained.

2. **Circumstantial Evidence:**

- Conviction can stand on strong circumstantial evidence sufficiently linking the accused to the crime.

3. **Conspiracy:**

- Conspiracy need not be proven directly but can be inferred from collective acts indicative of a common criminal purpose.

4. **Jurisdiction:**

- Under Paragraph (b), Section 14, Rule 110, an offense committed in transit can be tried in any area the vehicle passed through.

Class Notes:

- **Possession of stolen property:** Presumption of guilt unless proven otherwise. (People vs. Newman, 163 SCRA 496, People vs. Repuela, 183 SCRA 244)

- **Circumstantial Evidence:** Strong circumstantial evidence can warrant a conviction.

- **Conspiracy:** Inferred from collective actions toward a common criminal goal.

- **Jurisdiction:** Offenses occurring during transit can be adjudicated where the vehicle traversed. (Rule 110, Sec 14(b), Rules of Court)
- **Article 10, Revised Penal Code:** Serves as supplementary to specific laws like Republic Act No. 7659.

Historical Background:

During the early 1990s, crimes involving vehicular theft and violent assaults were a growing concern. This judicial decision in 1993 reflects the Philippine judicial system's attempts to address these issues strongly through firm legal doctrines, the reinforcement of procedural rules, and bolstering law enforcement's credibility in criminal prosecutions.