

Title: People of the Philippines v. Rey Deniega y Macoy and Hoyle Diaz y Urnillo

Facts:

Marlyn Canoy Bendo was found dead with 39 stab wounds and signs of sexual assault near Mt. Carmel Church, Quezon City, in 1989. Rey Deniega, Canoy's ex-boyfriend and a waiter at the disco Canoy worked, had tried to rekindle their relationship to no avail and was last seen with her. Following Deniega's arrest, Hoyle Diaz, an acquaintance of Canoy who also coursed drinks with her and Deniega, was invited for questioning. Both men gave confessions implicating themselves in the rape and killing of Canoy.

They were charged with Rape with Homicide under an Information filed with the Regional Trial Court of Quezon City. However, both appellants claimed their confessions were coerced through torture and without legal representation. Despite appellants' motion for Demurrer to Evidence due to insufficiency and inadmissibility, the trial court convicted them to Reclusion Perpetua and awarded damages to Canoy's heirs.

Issues:

1. Whether the confessions obtained by law enforcement were acquired with the assistance of counsel and were, therefore, admissible in evidence.
2. Whether there was sufficient evidence to convict the appellants aside from their confessions.

Court's Decision:

The Supreme Court ruled in favor of the appellants, finding that the extrajudicial confessions were not admissible in evidence due to the failure to meet constitutional standards for competent and independent counsel during the custodial investigations. The Court held that the confessions were not voluntary and were obtained in violation of constitutional rights, casting doubt on their due execution. This led to the acquittal of both Deniega and Diaz.

Doctrine:

The Supreme Court reasserted doctrines regarding the rights of an individual under custodial investigation. It emphasized the necessity for any confession to be voluntary, made with the assistance of competent and independent counsel, expressly stated, and in writing to be admissible. The decision also highlighted the precautionary principle that safeguards an individual's right against self-incrimination and the coercive environment of custodial interrogations.

Historical Background:

The case reflects the Philippines' critical view of custodial investigations post-1987 Constitution, which aims to ensure that confessions are voluntary, informed, and obtained without coercion. It signifies the judiciary's commitment to upholding constitutional rights over the urgency to solve crimes, reinforcing the legal tenet that it is better to let a guilty person free than to convict an innocent one unjustly.