

Title: People of the Philippines vs. Ricky Hijada y Villanueva, Danilo Alcera y Alfon, and Rodelio Villamor y Rabanes (GR No. 143332)

Facts:

On September 14, 1992, in Quezon City, Philippines, appellants Ricky Hijada, Danilo Alcera, and Rodelio Villamor were accused of robbing the residence of Filonila Tupaz and killing three persons—Filonila Tupaz, Filomena Garcia, and Rosemarie Diaz. Multiple items were stolen, and the victims were found stabbed to death. The case reached the Supreme Court on appeal from the Regional Trial Court of Quezon City, which had convicted the appellants of Robbery with Multiple Homicide and sentenced them to death. The Supreme Court received two Appellants' Briefs, one filed by Atty. Rolando L. Villones for all appellants and the other by the Public Attorney's Office for appellant Danilo Alcera, raising issues regarding admissibility of evidence and the propriety of the death penalty.

Issues:

1. Whether the extrajudicial confession of appellant Danilo Alcera is admissible in evidence.
2. Whether appellants were lawfully arrested without a warrant, and if the evidence obtained as a result of that arrest is admissible.
3. Whether the guilt of the appellants was proven beyond reasonable doubt based on the circumstantial evidence presented.
4. Whether the trial court erred in imposing the death penalty given the applicable statutes and constitutional provisions at the time of the crime.

Court's Decision:

1. The extrajudicial confession of appellant Danilo Alcera was deemed inadmissible, as it was made without the assistance of counsel, which is unconstitutional. The waiver of rights, though in writing, was invalid because it was not made in the presence of a lawyer.
2. Although the arrests of the appellants were made without appropriate warrants, the issue was considered waived because the appellants did not raise any objections before or at their arraignment.
3. The Court found that the circumstantial evidence presented was sufficient to establish guilt beyond a reasonable doubt. The circumstances included appellants' plan to rob the victim, their presence at the crime scene, recovery of the stolen items from their possession, and a blood-stained shirt worn by Ricky.
4. The imposition of the death penalty was improper since, at the time of the crime, reclusion perpetua was the maximum penalty due to constitutional restrictions on the death penalty. The later imposition of the death penalty in 1993 by Republic Act No. 7695 could

not be applied retroactively.

Doctrine:

The case upholds the principle that any confession obtained without the assistance of counsel during custodial investigation is inadmissible as evidence. It also reaffirmed the guidelines for the admissibility of circumstantial evidence. The ruling clarified that the penalty for Robbery with Homicide is reclusion perpetua, not death, in accordance with the law in effect at the time of the crime's commission.

Class Notes:

- Constitutional right against self-incrimination and right to counsel during custodial investigation.
- Circumstantial evidence is sufficient for conviction if it meets the requisites of more than one circumstance, proven facts, and combination of circumstances that leads to a conviction beyond reasonable doubt.
- Waiver of objections to arrest or jurisdiction over person must occur at or before arraignment; otherwise, it is considered waived.
- The penalty for the complex crime of Robbery with Homicide under Article 294, Revised Penal Code, is reclusion perpetua when death is not legally permissible.

Historical Background:

The historical context involves the constitutional prohibition against the death penalty from 1987 to 1993 in the Philippines. The constitutional ban on the death penalty reflected a period of re-examination of capital punishment by the Philippine government. However, capital punishment was reinstated for certain heinous crimes with the passing of Republic Act No. 7659 in December 1993. The case also illustrates the tension between law enforcement practices and constitutional rights during a period marked by high-profile crime cases and public demand for effective policing.