

### Title: People of the Philippines vs. Khaddafy Janjalani, et al.

### Facts:

On the evening of February 14, 2005, an RRCG bus was traversing its southbound route from Navotas to Alabang via EDSA when two men, later identified as members of the Abu Sayyaf Group (ASG), boarded the bus at Guadalupe-EDSA. Their suspicious behavior alerted the bus conductor, Elmer Andales. Soon after they alighted at the corner of Ayala Avenue and EDSA, an explosion occurred inside the bus, leading to casualties. Simultaneously, ASG spokesperson, Abu Solaiman, announced on the radio a “Valentine’s Day gift” for then-President Gloria Macapagal-Arroyo and warned of more bombings.

Accused Gamal B. Baharan, Angelo Trinidad, and Gappal Bannah Asali were identified and arrested. Trinidad and Baharan initially pleaded guilty to the multiple murder charge and later, inconsistently, pleaded not guilty to the multiple frustrated murder charge. However, after reconsideration, they pleaded guilty to all charges. Asali, after being discharged as a state witness, detailed his involvement and the planning that led to the bombing. The case reached the Supreme Court following appeals against their convictions by the Court of Appeals, which had affirmed the decision of the Regional Trial Court of Makati, sentencing the accused to reclusion perpetua following the abolition of the death penalty.

### Issues:

1. Whether the searching inquiry conducted was sufficient upon the accused’s change of plea from “not guilty” to “guilty.”
2. Whether the guilt of the accused for the crimes charged had been proven beyond reasonable doubt.

### Court’s Decision:

1. **\*\*On the Insufficiency of Searching Inquiry\*\***: The Court recognized the precedence requiring a thorough inquiry into the voluntariness of a guilty plea but deemed it unnecessary to remand the case for re-arraignment. This decision was based on the context that their guilty pleas were not solely the basis of their conviction; they had also made extrajudicial confessions and judicial admissions.
2. **\*\*On the Proof Beyond Reasonable Doubt of the Accused’s Guilt\*\***: The Court upheld the convictions, taking into account the corroborating testimonies of the bus conductor and the state witness Asali, the judicial admissions, and the extrajudicial confessions that established the involvement of Baharan and Trinidad in the bombing. The Court further

upheld Rohmat's conviction based on the principle of conspiracy and as a principal by inducement in the commission of the crime.

### ### Doctrine:

The Supreme Court reiterated the doctrines surrounding plea-of-guilt proceedings in capital offenses, emphasizing the necessity of a searching inquiry to ensure the accused's full comprehension of the plea. Additionally, it reaffirmed the guidelines on establishing conspiracy and the responsibility of principals by inducement within criminal activities.

### ### Class Notes:

- **Searching Inquiry**: A mandatory and thorough investigation into the voluntariness of an accused's plea of guilty, especially in capital offenses, to ensure understanding and absence of coercion (People v. Aduhan; Section 3, Rule 116, Rules of Court).
- **Conspiracy**: The collective act or series of acts demonstrating a common goal or design among perpetrators towards committing a crime. Inference of conspiracy arises from acts signifying concurrence of wills (People v. Lenantud).
- **Principal by Inducement**: A party whose influence, command, or advice was so pivotal that without it, the criminal act would not have materialized (Article 17, Revised Penal Code).

### ### Historical Background:

This case reflects the complexities of combating terrorism within the legal framework of the Philippines. It emphasizes the judiciary's role in ensuring that convictions, especially for grievous crimes like terrorism-triggered multiple murders, are grounded in a meticulous legal process to uphold justice while safeguarding the rights of the accused.