

**\*\*Title:\*\* People of the Philippines v. Gerrico Vallejo y Samartino**

**\*\*Facts:\*\***

On July 10, 1999, in Rosario, Cavite, 9-year old Daisy Diolola was sent by her mother to their neighbor's for tutoring. The tutor was unavailable, leading to interactions between Daisy and Gerrico Vallejo, the tutor's brother. Vallejo and Daisy were seen together looking for a book for Daisy's project, and later Vallejo led Daisy away to an unspecified location. That evening, when Daisy did not return home, her mother initiated a search. The following morning, Daisy's body was found tied to an aroma tree near a river, showing signs of rape and manual strangulation.

Upon investigation, Vallejo was identified as the last person seen with Daisy. The prosecution provided witness testimonies, forensic evidence, and several confessions from Vallejo affirming his guilt. The defense countered with alibis and claims of forced confessions through torture. The case traversed the legal system, benefiting from extensive evidence analysis, including DNA testing, which linked Vallejo to the crime. Eventually, the Regional Trial Court found Vallejo guilty, sentencing him to death and ordering him to pay damages to the victim's family.

**\*\*Issues:\*\***

1. Whether circumstantial evidence and witness testimonies presented by the prosecution sufficiently proved Vallejo's guilt beyond a reasonable doubt.
2. The admissibility and validity of Vallejo's oral and written confessions.
3. The claim of forced confessions and the adequacy of legal representation during custodial investigation.

**\*\*Court's Decision:\*\***

The Supreme Court affirmed the trial court's decision, finding Vallejo guilty of rape with homicide. The decision highlighted:

- The circumstantial evidence, combined with witness testimonies, was compelling enough to establish guilt.
- Vallejo's confessions, both oral and written, were deemed voluntary and admissible, despite his claims of coercion, as they were corroborated by his legal counsel's presence and the physical evidence.
- The court dismissed the torture claims due to lack of supporting evidence and inconsistencies with the nature of Vallejo's injuries.

**\*\*Doctrine:\*\***

The case underscored the principle that direct evidence is not the sole means of proving guilt beyond reasonable doubt. Circumstantial evidence, when sufficiently convincing and interlocking, can establish guilt. It also reiterated legal safeguards for the admissibility of confessions, including the presence of counsel and the voluntariness of the confession.

**\*\*Class Notes:\*\***

- Circumstantial Evidence: Requires (a) more than one circumstance, (b) facts from which inferences are derived must be proven, and (c) the combination of all circumstances leads to a conviction beyond reasonable doubt.
- Confessions: Voluntariness and presence of counsel are critical for admissibility. Claims of coercion must be substantiated by evidence.
- DNA Evidence: Plays a crucial role in corroborating circumstantial evidence and confessions.

**\*\*Historical Background:\*\***

This case illustrates the utilization of evolving forensic techniques, such as DNA testing, in the Philippine judiciary system. It reflects on the legal standards for evidence admissibility and the due process of law, emphasizing the protection of rights of the accused while ensuring justice for victims of heinous crimes.