

****Title:**** People of the Philippines v. Hector Maqueda @ Putol

****Facts:****

British consultant Horace William Barker and his wife Teresita Mendoza were violently attacked in their Tuba, Benguet home on August 27, 1991, during a robbery. Horace died from the assault, and Teresita sustained serious injuries. Rene Salvamante, a former houseboy, and Hector Maqueda were implicated in the crime. Initially, Richard Malig was included in the charge but was later removed due to insufficient evidence. Maqueda was arrested on March 4, 1992, and attempted to volunteer as a state witness claiming lesser guilt. The trial against Maqueda proceeded singularly due to Salvamante's absconsion. Based on the evidence and witness testimony, the Regional Trial Court of Benguet convicted Maqueda of robbery with homicide and serious physical injuries, sentencing him to reclusion perpetua and ordering him to pay damages to Teresita Barker. Maqueda's conviction was significantly based on his own admissions and circumstantial evidence, despite doubts over eyewitness identification.

****Issues:****

1. Whether the trial court erred in finding Maqueda guilty based on circumstantial evidence and his own admissions.
2. The applicability and adherence to constitutional rights during Maqueda's post-arrest investigation.
3. The validity and admissibility of Maqueda's extrajudicial confession and admissions.

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

The Supreme Court dismissed the appeal and affirmed the trial court's decision in toto. It clarified that Maqueda's extrajudicial confessions to public officials without counsel were inadmissible due to constitutional violations. However, admissions to a private individual (Ray Dean Salvosa) and a prosecutor under non-custodial circumstances were admissible. Furthermore, the Court held that circumstantial evidence presented an unbroken chain leading to Maqueda's guilt beyond reasonable doubt.

****Doctrine:****

The decision emphasized the distinction between extrajudicial confessions (inadmissible without the presence of counsel) and admissions (which might be admissible depending on

the context of their procurement). It reiterated the requirements for the admissibility of circumstantial evidence, namely more than one circumstance, proven facts from which inferences are derived, and a combination of circumstances pointing unequivocally to the accused's guilt.

****Class Notes:****

- ****Extrajudicial Confessions vs. Admissions:**** An extrajudicial confession is an explicit acknowledgment of guilt by an accused, requiring the presence of counsel during its procurement to be admissible in court. In contrast, an admission is a statement that, coupled with other facts, tends to prove guilt but does not directly acknowledge it and may not always require counsel's presence to be admissible.
- ****Circumstantial Evidence:**** Conviction based on circumstantial evidence requires it to be of such a nature that the inference of the accused's guilt is compelling and excludes any reasonable hypothesis of innocence. It must be more than one circumstance, the facts inferred must be proven, and the combined circumstances must lead to a conclusion of guilt beyond reasonable doubt.
- ****Constitutional Rights During Arrest and Detention:**** An accused has the right to be informed of their rights to remain silent and to have competent and independent counsel preferably of his own choice. Any confession or admission obtained in violation of these rights is inadmissible in evidence.

****Historical Context:****

This case highlights the intricacies of the Philippine legal system's handling of rights to counsel and admissibility of evidence. It underscores the constitutional safeguards in place to prevent coercion and ensure fair trial procedures, reflecting the judiciary's ongoing efforts to balance law enforcement objectives with individual rights.