

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

****Facts:****

The case revolves around the brutal murder of Horace William Barker and the severe assault of his wife, Teresita Mendoza Barker, during a robbery in their home in Tuba, Benguet, Philippines, on August 27, 1991. Initial suspicions pointed to Rene Salvamante, the victims' former houseboy. Hector Maqueda, also known as Putol, was later implicated based on evidence tying him to the crime scene. The information for robbery with homicide and serious physical injuries was filed against Richard Malig and subsequently amended to include Maqueda while dropping charges against Malig due to lack of evidence against him. Maqueda, after being arrested, offered to be a state witness, claiming he was the least guilty. However, the trial focused solely on Maqueda as Salvamante remained at large. The prosecution presented a series of witnesses, and the trial court ultimately based Maqueda's conviction on his confession, the proof of corpus delicti, and circumstantial evidence, despite doubts on the direct identification of Maqueda by the victims and witnesses.

****Issues:****

1. Whether the trial court erred in finding Maqueda guilty beyond reasonable doubt of the crime charged.
2. The applicability and validity of Maqueda's extrajudicial confession.
3. The admissibility and weight of circumstantial evidence leading to the conviction of Maqueda.

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

The Supreme Court dismissed Maqueda's appeal, affirming the trial court's decision. The Court ruled that Maqueda's defense of alibi was unconvincing and that despite the invalidation of his extrajudicial confession due to the violation of his constitutional rights, his voluntary admissions to the prosecutor and a private individual, coupled with circumstantial evidence, were sufficient to establish his guilt beyond reasonable doubt.

****Doctrine:****

The Court reiterates the doctrine distinguishing between a confession and an admission and emphasizes the constitutional rights of an individual under investigation, including the right to remain silent, the right to counsel, and the right to be informed of these rights. It also provided a guide on the admissibility of circumstantial evidence, establishing that a conviction based on such evidence requires it to be compelling enough to lead to a conclusion beyond reasonable doubt of the accused's guilt.

****Class Notes:****

- ****Elements of a Crime:**** For conviction, direct evidence or a combination of circumstantial evidence must unequivocally establish the accused's guilt.
- ****Constitutional Rights during Custodial Investigation:**** The accused must be informed of their rights - to remain silent, to have competent and independent counsel preferably of their own choice, and that any statement they make may be used against them. Violations of these rights render any confession or admission inadmissible.
- ****Circumstantial Evidence:**** Must fulfill three criteria: there is more than one circumstance; the facts from which the inferences are derived are proven; and the combination of all circumstances leads to a conviction beyond reasonable doubt.
- ****Admissibility of Evidence:**** Extrajudicial confessions are inadmissible unless accompanied by counsel. However, admissions made to non-law enforcement individuals and voluntary offers to serve as state witnesses are admissible.

****Historical Background:****

The case provides insight into the legal challenges and considerations in criminal proceedings, especially regarding the rights of the accused during custodial investigations as emphasized in the Philippine Constitution. The ruling underscores the judiciary's strict adherence to constitutional guarantees and highlights the significance of circumstantial evidence in filling gaps where direct evidence or witness testimonies may be lacking or compromised.