

Title:

The People of the Philippines vs. Pablito Andan y Hernandez

Facts:

On February 19, 1994, a 20-year-old student, AAA, left her home for her dormitory when accused-appellant Pablito Andan lured her into his house under a pretext and raped her. Following the assault, Andan attempted to conceal his crime by killing AAA with concrete blocks and hiding her body. The next day, AAA's body was discovered, initiating a police investigation that led to Andan's apprehension at his parents' home on February 24, 1994. During initial questioning, Andan, unassisted by counsel, implicated his neighbors but eventually led police to evidence corroborating his involvement. Subsequently, in a private confession to the mayor and later to media representatives, Andan admitted his guilt. However, at arraignment, he pled not guilty and claimed an alibi. The trial court convicted Andan of rape with homicide, sentencing him to death and ordering compensation to AAA's heirs. The Supreme Court automatically reviewed the case due to the death penalty sentence.

Issues:

1. Whether the admission and use of Andan's extrajudicial confessions during the custodial investigation, without counsel, violated constitutional rights.
2. Sufficiency of evidence to support a finding of rape.
3. The admissibility of confessions made to media representatives and the mayor.

Court's Decision:

1. Andan's initial confession during the custodial investigation was deemed inadmissible due to lack of counsel. However, his spontaneous, voluntary confessions to the mayor and media were admissible, as they were not elicited through interrogation by authorities but were instead freely given.
2. Evidence of rape was substantiated by the victim's injuries and corroborated by circumstantial evidence, despite the absence of spermatozoa.
3. The Supreme Court affirmed the trial court's decision, sustaining Andan's conviction for rape with homicide, maintaining the death penalty sentence, and dismissing the alibi defense due to the proximity of his parents' home to the crime scene.

Doctrine:

- Extrajudicial confessions made without counsel during custodial investigations are inadmissible as evidence. However, spontaneous declarations made outside interrogation

settings to individuals not acting under police direction, including media representatives and public officials in non-investigatory capacities, do not violate constitutional rights against self-incrimination and may be admissible.

Class Notes:

- Essential elements of rape with homicide include the act of rape followed by the killing of the victim, both actions attributable to the accused.
- Custodial Interrogation: Rights to counsel, to remain silent, and to be informed of such rights are critical to the admissibility of confessions. Violations render confessions inadmissible (Sec. 12(1), Art. III, 1987 Philippine Constitution).
- Doctrine on Admissibility: Voluntary confessions to non-police individuals, including media, can be admissible if freely and spontaneously made without coercion or influence from investigating authorities.
- Evidence of rape does not solely depend on the presence of spermatozoa; other forms of proof, like physical injuries indicative of sexual assault, are valid.
- The defense of alibi must prove the physical impossibility of the accused's presence at the crime scene. Proximity undermines this defense.

Historical Background:

This case reflects the judiciary's nuanced approach towards assessing confessions and their admissibility, highlighting constitutional protections during custodial investigations. It stresses the importance of voluntariness and counsel in confessions' legality and the evaluation of circumstantial evidence in substantiating specific crimes like rape with homicide.