

****Title:**** People of the Philippines vs. Larry Mahinay y Amparado

****Facts:**** Larry Mahinay began working as a houseboy for Maria Isip on November 20, 1993. Isip was constructing a house adjacent to her old residence in Valenzuela, Metro Manila, where Mahinay was tasked to stay and sleep in an apartment also owned by Isip. The victim, Ma. Victoria Chan, a 12-year-old neighbor, often played in the compound. On June 25, 1995, after joining a drinking spree, Mahinay asked Isip for permission to go out. That afternoon, witnesses saw the victim catching birds inside Isip's unfinished house. Later, Mahinay appeared uneasy and drunk when attempting to purchase lugaw (rice porridge) from a nearby store. By evening, the victim was missing. The following day, her body was discovered in a septic tank within the compound, bearing signs of rape and fatal injuries.

****Procedural Posture:**** After Mahinay's confession and arrest on July 7, he was charged with rape with homicide on July 10, 1995. Despite pleading not guilty, the trial court convicted Mahinay, sentencing him to death and ordering him to pay P73,000.00 to the victim's heirs. The case was automatically reviewed by the Supreme Court due to the imposed death penalty.

****Issues:****

1. Whether the circumstantial evidence presented was sufficient to convict Mahinay beyond a reasonable doubt.
2. Whether Mahinay's extrajudicial confession was admissible and voluntarily made.
3. The appropriateness of the death penalty under the circumstances of the crime.

****Court's Decision:**** The Supreme Court affirmed Mahinay's conviction, emphasizing the concurrence and sufficiency of circumstantial evidence that pointed to his guilt beyond reasonable doubt. It found Mahinay's confession, obtained with legal assistance, to be voluntarily made, thereby admissible in court. The Court upheld the death penalty, highlighting the severity of the crime of rape with homicide under the circumstances provided by law.

****Doctrine:**** Conviction may be had on circumstantial evidence if it is consistent with the hypothesis of guilt and inconsistent with any other rational hypothesis except that of guilt. The absence of direct evidence does not absolve a defendant if the circumstantial evidence meets this standard.

****Class Notes:****

1. **Circumstantial Evidence**: For conviction, must meet three criteria: plurality of circumstances, evidence of facts from which inferences are derived, and conviction beyond reasonable doubt.
2. **Extrajudicial Confession**: To be admissible, must be made voluntarily, knowingly, and intelligently, with the assistance of competent and independent counsel.
3. **Death Penalty Criteria**: Applied where the law mandates, specifically for crimes demonstrating utmost disregard for human life, like rape with homicide under Article 335 of the Revised Penal Code (RPC), as amended.

Historical Background: This case reflects the legal and societal stance against violent crimes, especially those involving vulnerable victims like children, reinforcing the notion of aggravating circumstances leading to the imposition of the highest form of penalty - demonstrating the law's stringent approach to deterring heinous offenses and upholding justice for the aggrieved.