

### ### Title

People of the Philippines vs. Abdila Silongan et al. (Kidnapping for Ransom Case)

### ### Facts

On March 16, 1996, in Barangay Laguilayan, Isulan, Sultan Kudarat, businessman Alexander Saldaña, accompanied by Americo Rejuso, Jr., Ervin Tormis, and Victor Cinco, were kidnapped by Abdila Silongan, Macapagal Silongan, Akmad Awal, Rolly Lamalan, Sacaria Alon, Jumbrah Manap, Ramon Pasawilan, and other unidentified persons for a ransom of Twelve Million Pesos (P12,000,000.00). The Regional Trial Court (RTC) of Quezon City, Branch 103, convicted seven appellants, and acquitted Teddy Silongan, sentencing the convicted to death and ordering joint and several indemnification and moral damages to Saldaña and Rejuso Jr.

The appellants contested the RTC decision, leading to an automatic review by the Supreme Court. The prosecution detailed how Saldaña and his group, intending to transact for gold nuggets with Macapagal Silongan, were deceived under the guise of attending a relative's funeral, later abducted and detained in various hideouts across Maguindanao. Throughout their six-month captivity, the accused demanded ransom, transferred the victims amongst various locations, with the captors even attempting negotiations with Saldaña's family. The military's involvement led to Saldaña's release.

The defense included denials of involvement and claims of being government surrenderers under promised amnesty, alongside assertions of their illiteracy and misrepresentation during confession.

### ### Issues

The central legal issue pertains to the credibility of eyewitness testimonies against the backdrop of illiteracy and alleged lack of understanding during the confession process by the appellants. Moreover, the validity of extra-judicial confessions, the appellants' identification under duress, and the presence of mitigating circumstances due to appellants' claimed illiteracy were also scrutinized.

### ### Court's Decision

The Supreme Court sustained the RTC's decision, focusing on the overwhelming evidence and consistent positive identifications outweighing the appellants' denials. The Court found the appellants' extra-judicial confessions inadmissible but still affirmed the conviction based on substantial eyewitness testimonies and the coherent sequence of events depicting the

appellants' involvement. Issues surrounding illiteracy and potential mitigating circumstances were deemed insufficient to alter the prescribed single indivisible penalty of death for kidnapping for ransom.

### ### Doctrine

The decision reiterated the precedence of positive identification over denial, especially when unburdened by questionable motives. It also emphasized that in cases prescribing a single indivisible penalty, mitigating circumstances like illiteracy do not affect the penalty's imposition.

### ### Class Notes

- **Positive Identification vs. Denial:** Positive, consistent, and straightforward identification of the accused prevails over simple denial.
- **Admissibility of Extra-Judicial Confessions:** Confessions must be made with adequate understanding and legal representation to be admissible.
- **Kidnapping for Ransom (Article 267, RPC):** Requires proving intent, actual deprivation of liberty, illegal detainment, and specifically the act's perpetration for extorting ransom.
- **Single Indivisible Penalty:** Mitigating circumstances do not affect the imposition of a prescribed single penalty.

### ### Historical Background

This case underscores the legal system's handling of extortion-related kidnappings, highlighting the complications introduced by illiteracy and allegations of forced confessions within conflict-stricken areas in the Philippines. It demonstrates the judiciary's reliance on consistent victim testimonies and substantial evidence in adjudicating high-stakes criminal cases amidst claims of coercion and irregularities in legal representation during confessions.