

****Title:**** The People of the Philippine Islands vs. Graciano L. Cabrera et al.

****Facts:**** On December 13, 1920, in Manila, a conflict arose between members of the Philippine Constabulary and the Manila Police Department following the arrest of a Constabulary soldier's household member by the police. This incident led to tension, culminating in an armed encounter on December 14 where Constabulary Private Macasinag was fatally wounded by Policeman Mojica. Resentment among the Constabulary soldiers grew, leading to a violent uprising on December 15, where several police officers and civilians were killed in different locations throughout Manila. Following these events, an investigation led by Colonel Sweet and other officials resulted in the written confessions of 77 Constabulary soldiers admitting their participation in the riot. Based on these confessions and additional evidence, the defendants were charged with sedition, murder, and serious physical injuries. The case, after separate trials, was appealed to the Supreme Court.

****Issues:****

1. Whether the confessions (Exhibits C to C-76) were admissible as they were alleged to have been obtained through deceit.
2. Whether there was a conspiracy among the accused.
3. Whether the actions of the accused constituted sedition under Act No. 292.

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

1. The court ruled that the confessions were freely and voluntarily made, as the accusations of deceit were not substantiated. It highlighted the defendants' law enforcement background, their basic understanding despite language barriers, and their court reiterations of guilt.
2. The court found evidence of a common purpose and concerted action among the defendants to avenge perceived wrongs against the Constabulary, constituting a conspiracy.
3. The actions of the accused were deemed to meet the criteria for sedition as outlined in Act No. 292 since they publicly and tumultuously sought to inflict acts of hate or revenge upon officials or agents of the government.

****Doctrine:****

- A confession must be made freely and voluntarily without any compulsion or inducement.
- If two or more persons combine for a criminal act, each is responsible for the acts done in furtherance of the common design.
- Sedition encompasses actions undertaken publicly and tumultuously to obtain, by force or

outside legal methods, an act of hate or revenge upon government officials or agents.

****Class Notes:****

- ****Elements of Sedition:**** Public and tumultuous uprising intending to inflict acts of hate or revenge upon government officials or agents.
- ****Conspiracy:**** Liability extends to all participants in a common plan, with each responsible for the acts of the others done in furtherance of the plan.
- ****Admissibility of Confessions:**** Must be freely and voluntarily made without coercion. Burden of proof lies with the defendant to show any compulsion or inducement (Act No. 619 repealed, principle remains per jurisprudence).

****Historical Background:****

This case emerges in the context of post-World War I Philippines, a period marked by political unrest and burgeoning movements for independence from American rule. The incident reflects underlying tensions between different arms of the colonial government's security forces, exacerbated by personal grievances and broader dissatisfaction among Filipino personnel within the constabulary and police forces. The brutal response to the riot and its legal aftermath underscore the volatile situation in the Philippines during the American colonial period, revealing the complexities of loyalty, colonial governance, and the quest for justice and order in a time of political transition.