

Title: **Cecilio M. Lino vs. Valeriano E. Fugoso, et al.**

Facts:

This case involves a petition for a writ of habeas corpus filed on behalf of twelve individuals allegedly unlawfully detained by Valeriano E. Fugoso (Mayor), Lamberto Javalera (Chief of Police), and an Officer in Charge of the Municipal Jail, all of the City of Manila. The detainees were accused of inciting to sedition related to a labor strike but were held without formal charges or warrants.

A detailed procedural play unfolded as follows:

1. The initial arrest without warrant of the twelve individuals occurred between November 5 and November 8, 1946, amidst a labor strike in Manila.
2. The petition for habeas corpus was filed on the morning of November 11, 1946.
3. Respondents admitted that ten of the detainees had been released by the afternoon of November 11, 1946, due to insufficient evidence for prosecution. However, Pascual Montaniel and Pacifico Deoduco remained detained under new charges unrelated to sedition: unjust vexation and disobedience to police orders, respectively.
4. Upon reviewing the case, the Supreme Court ordered the release of Montaniel and Deoduco by a minute resolution on November 11, 1946, pending a detailed decision.
5. The prosecution admitted the arrest and continued detention of Montaniel and Deoduco were based on new charges filed only on November 12, 1946, indicating a proactive legal maneuver following the habeas corpus petition. **There were no warrants of arrest or orders of commitment issued by the municipal court for these new charges at the time of the Supreme Court's hearing.**

Issues:

1. Whether the detention of Pascual Montaniel and Pacifico Deoduco was illegal due to the lack of warrants and proper charges filed within the legal timeframe.
2. Whether the continued detention of individuals, after being cleared of initial charges, due to subsequently filed charges without warrants or court orders, is lawful.

Court's Decision:

The Supreme Court held that the detention of Montaniel and Deoduco became illegal upon the expiration of six hours from their arrest without being delivered to the corresponding

judicial authorities. The subsequent filing of charges for lighter offenses did not legalize their detention since no warrants of arrest or orders of commitment were issued by the municipal court. Their cases' reference to the City Fiscal after the permissible period extended their illegal detention. Accordingly, the detention was declared unlawful, and their immediate release was ordered.

Doctrine:

The Supreme Court reiterated the doctrine that the police must deliver an individual arrested without a warrant to the judicial authorities within six hours to prevent illegal detention, as mandated by Article 125 of the Revised Penal Code, as amended by Act No. 3940.

Class Notes:

- **Legal Basis for Arrest Without Warrant:** An arrest without a warrant is permissible only when there is reasonable ground to believe that a person has committed a crime (Rule 109, Section 6, Rules of Court).
- **Illegality of Prolonged Detention:** Detention beyond six hours without delivering the arrested person to judicial authorities is illegal (Article 125, Revised Penal Code, as amended by Act No. 3940).
- **Filing of Charges for Light Offenses:** When the offense charged is light, the accused, as a general rule, should not be arrested unless the court expressly orders it (Rule 108, Section 10, Rules of Court).

Historical Background:

This case occurred in the post-World War II era, reflecting tensions between labor movements and governmental authorities in the emerging Philippine Republic. The Supreme Court's decision underscored the importance of judicial oversight and procedural safeguards to prevent unlawful detention, echoing democratic principles enshrined in the newly established Philippine Constitution.