

### Title:

The People of the Philippines vs. Federico Geronimo alias Cmdr. Oscar: On Rebellion and the Absorption of Related Crimes

### Facts:

The case involves Federico Geronimo, among others, charged with the complex crime of rebellion with murders, robberies, and kidnappings. The information was filed on June 24, 1954, in the Court of First Instance of Camarines Sur. It accuses the involved parties of affiliating with the Communist Party of the Philippines (CPP) and the Hukbong Mapagpalaya Ng Bayan (HMB), engaging in a conspiracy to commit rebellion, and consequently committing various violent acts such as ambushes, murders, robberies, and kidnappings across the country to achieve their objectives.

Notably, on October 12, 1954, Geronimo changed his initial plea of not guilty to guilty. The court, upon the fiscal's recommendation and considering Geronimo's guilty plea as a mitigating circumstance, sentenced him to reclusion perpetua, among other penalties. Dissatisfied, Geronimo appealed the decision, challenging the classification of his crimes as a complex crime rather than simple rebellion.

### Issues:

1. Whether the crime committed by the appellant constitutes the complex crime of rebellion with murders, robberies, and kidnappings, or should be classified as simple rebellion.
2. The proper interpretation of rebellion under Philippine law and whether acts of violence related to it should be absorbed by the crime of rebellion.

### Court's Decision:

The Supreme Court, guided by a recent resolution in *People vs. Hernandez*, affirmed that the crime of rebellion should absorb the acts of violence committed in its furtherance. It established that both intent and overt acts are integral to rebellion, dismissing the possibility of complexing it with related crimes of murder, robbery, and kidnappings. Consequently, acts described in the information that furthered the political goal of rebellion, such as ambushes on army patrols and taking of funds from the Provincial Treasury of Laguna, were considered parts of the crime of rebellion, not separate or complex crimes. The Court modified the trial court's decision, convicting Geronimo of simple rebellion and also separately for murder with respect to certain acts that could not be absorbed by the rebellion due to jurisdictional issues and the nature of the acts.

### Doctrine:

- The principle established is that acts of violence, when committed as a means to or in furtherance of rebellion, should be absorbed by the crime of rebellion and cannot be penalized as distinct or give rise to a complex crime under article 48 of the Revised Penal Code.

### Class Notes:

- Essential Elements of Rebellion: The coexistence of (1) an armed uprising with (2) the intent to remove allegiance to the government or its laws, or to deprive the Chief Executive or Legislature of any of their powers or prerogatives.
- Relevant Statute: Article 134 and 135 of the Revised Penal Code, focusing on how rebellion is committed and the penalties for it, respectively.
- The application of Article 48 of the Revised Penal Code (on complex crimes) is not applicable when the acts are done in furtherance of rebellion.

### Historical Background:

The case is rooted in the turbulent post-World War II era in the Philippines, marked by the rise of the Hukbalahap movement against the Japanese occupation, which transitioned into a communist insurgency against the Philippine Government. The legal proceedings against Federico Geronimo and others reflect the government's efforts to quell the rebellion and the complex interplay between acts of violence and political motivations underlying the rebellion. This decision reiterates the Supreme Court's stance on the legal treatment of rebellion and related crimes, signifying a crucial point in the adjudication of politically motivated violence in the Philippines.