

Title: People of the Philippines vs. Arnel Alicando y Briones

Facts:

The case revolves around Arnel Alicando, accused of raping and murdering four-year-old Khazie Mae Penecilla on June 12, 1994, in Iloilo City, Philippines. Alicando was charged with rape with homicide. He pleaded guilty upon arraignment with the assistance of a PAO lawyer. Despite his plea, the trial court conducted hearings where witness Luisa Rebada testified about seeing Alicando raping the victim. The prosecution also presented physical evidence and an autopsy report indicating injuries consistent with rape and asphyxia by strangulation due to fractured cervical vertebra as the cause of death. On July 20, 1994, the trial court found Alicando guilty and sentenced him to death.

The case reached the Supreme Court on automatic review due to the imposition of the death penalty.

Issues:

1. Was the arraignment of Alicando valid, considering the Information was not verified if it was read in a language or dialect known to him?
2. Was Alicando's plea of guilt made with full comprehension of its consequences, considering the minimal inquiry into its voluntariness?
3. Were the prosecution's physical evidence admissible despite being derived from an uncounselled verbal confession?

Court's Decision:

The Supreme Court found significant errors in Alicando's arraignment, plea of guilt, and the admissibility of evidence derived from an uncounselled confession. Specifically:

1. The arraignment was void due to insufficient evidence that the Information was read in Alicando's known dialect, violating his right to be informed of the charge.
2. The inquiry into the voluntariness of Alicando's plea of guilt was inadequate, with no exploration into his understanding of the plea's consequences.
3. Physical evidence derived from an uncounselled confession was inadmissible, undermining its basis for conviction.

Consequently, the Court annulled the trial court's decision, acquitted Alicando on account of procedural violations, and remanded the case for further proceedings, establishing a critical distinction between procedural safeguards and the substantive rights of the accused.

Doctrine:

1. An arraignment's validity hinges on fulfilling the accused's right to be informed of the charge in a language or dialect known to them.
2. A guilty plea in capital offenses requires a searching inquiry into its voluntariness and full comprehension by the accused.
3. Evidence derived directly or indirectly from an uncounselled confession is inadmissible in court.

Class Notes:

- The arraignment process must confirm that the accused understands the charge, facilitated by communication in a language or dialect known to the accused.
- The voluntariness of a guilty plea, especially in capital offenses, is subject to rigorous scrutiny, ensuring that the accused comprehends the consequences.
- The "fruit of the poisonous tree" doctrine renders evidence inadmissible if it stems from rights violations, like an uncounselled confession.

Historical Background:

This case illustrates the Philippine judiciary's stringent approach to upholding constitutional rights during criminal proceedings. It underscores the inviolability of the right to due process and the right against self-incrimination, particularly in cases involving the death penalty, highlighting the judiciary's role as protector of individual liberties against procedural lapses.