

**Title:** *People of the Philippines v. Jaime Ayochok y Tauli: The Termination of Criminal and Civil Liabilities upon the Death of the Accused*

**Facts:** Jaime Ayochok y Tauli (Ayochok) was charged with the murder of SPO1 Claudio Caligtan y Ngodo in Baguio City, Philippines, on July 15, 2001. Prosecuted for committing murder through treachery and cruelty, Ayochok pleaded not guilty. After a trial, the Regional Trial Court (RTC) of Baguio City convicted Ayochok of murder and sentenced him to reclusion perpetua, along with ordering him to pay various damages to the heirs of the deceased. Ayochok appealed the RTC's decision to the Supreme Court, which, following the ruling in *People v. Mateo*, redirected the case to the Court of Appeals. The Court of Appeals affirmed the RTC's decision with some modifications regarding the amounts awarded for damages. Ayochok attempted to appeal this decision back to the Supreme Court, but during the pendency of his appeal, he died. His death prompted the Supreme Court to consider the effect of an accused's death on appeal regarding criminal and civil liabilities.

**Issues:**

1. What is the effect of the death of the accused, Jaime Ayochok y Tauli, during the pendency of his appeal on his criminal liability for murder?
2. What is the effect of Ayochok's death during the pendency of his appeal on the civil liabilities adjudged against him?

**Court's Decision:**

The Supreme Court set aside the decision of the Court of Appeals and dismissed the criminal case against Ayochok following his death. The Court explained that Ayochok's death extinguished not only his criminal liability but also his civil liability that solely arose from or was based on the crime of murder. This ruling was premised on Article 89(1) of the Revised Penal Code and reinforced by the guidelines established in *People v. Bayotas*. Importantly, since Ayochok's appeal was pending and no final judgment had been rendered when he died, both his criminal and the corresponding civil liabilities (ex delicto) were extinguished.

**Doctrine:**

The death of the accused during the pendency of his appeal extinguishes both his criminal liability and the civil liability based solely on the offense committed, as prescribed by Article 89(1) of the Revised Penal Code and clarified in *People v. Bayotas*.

**\*\*Class Notes:\*\***

- **\*\*Criminal Liability Extinguishment Upon Death:\*\*** The death of an accused before final judgment extinguishes the accused's criminal liability, as well as civil liabilities based solely on the offense.
- **\*\*Relevant Statutory Provisions:\*\*** Article 89(1) of the Revised Penal Code; relevant discussions in *People v. Bayotas* provide jurisprudential backing for the doctrine of extinguishment of liability upon the accused's death.
- **\*\*Civil Liabilities Arising from Other Sources:\*\*** Civil liabilities not solely arising from the crime (e.g., liabilities from quasi-contracts or quasi-delicts) might not be extinguished and could be claimed against the deceased's estate in a separate civil action.
- **\*\*Impact on Pending Appeals:\*\*** The death of an accused during the appeal process leads to the dismissal of the criminal case and negates the necessity to review the appeal on its merits.

**\*\*Historical Background:\*\***

This case illustrates the application of the principle wherein an accused's death before the final judgment leads to a unique procedural outcome. This procedural doctrine stems from the broader principles of justice and personal culpability in criminal law, emphasizing that criminal penalties are personal to the accused and cannot extend beyond their lifetime, directly impacting the procedural approach within Philippine jurisprudence.