

Title: Alfredo Rodillas y Bondoc vs. The Honorable Sandiganbayan and The People of the Philippines

Facts:

Alfredo Rodillas y Bondoc, a policeman from the Integrated National Police Force of Caloocan City, was tasked on March 27, 1980, with escorting detainee Zenaida Sacris de Andres from the city jail to the Court of First Instance for a trial regarding a violation of the Dangerous Drugs Act of 1972. The decision to assign him came about because the policewoman originally designated for the task was indisposed. The procedural journey to the Supreme Court began after Rodillas allowed de Andres a series of liberties post-hearing, culminating in her escape. These liberties included taking lunch together, along with de Andres' husband, at the Genato Building's canteen, and later allowing her to use a comfort room on the building's second floor, wherein she eventually made her escape through a window. Rodillas, upon discovering the escape, pursued de Andres first to her home in Caloocan, then to Nueva Ecija, without success, and only later formally reported the escape to his superiors.

The Sandiganbayan, hearing the case, found Rodillas guilty beyond reasonable doubt of Infidelity in the Custody of Prisoner through Negligence under Article 224 of the Revised Penal Code, sentencing him to arresto mayor and temporary special disqualification. Rodillas filed a petition with the Supreme Court seeking reversal of this decision.

Issues:

1. Whether the Sandiganbayan erred in convicting Rodillas based solely on his admissions without the prosecution providing evidence of his negligence.
2. Whether Rodillas' actions constituted sufficient negligence to uphold the conviction for the infidelity in the custody of prisoners through negligence under Article 224 of the Revised Penal Code.

Court's Decision:

The Supreme Court dismissed the petition and affirmed the Sandiganbayan's decision, ruling that Rodillas was indeed negligent in his duty to secure custody of the prisoner, leading to her escape. The Court detailed that:

- Negotiable acts and failure to take necessary precautions, particularly allowing de Andres to take unsupervised liberties, constituted negligence.
- Rodillas' actions deviated significantly from his duties, contributing directly to de Andres' escape.

- The Court denied the necessity to prove connivance for a conviction under Article 224, clarifying that negligence alone suffices for liability.

Doctrine:

Under Article 224 of the Revised Penal Code, a public officer charged with the custody of a prisoner who escapes through the officer's negligence shall be penalized. This case underscores the necessity for law enforcement officers to exercise utmost diligence in the performance of their custodian duties and clarifies that connivance is not required to establish liability for evasion through negligence.

Class Notes:

- Essential Elements under Article 224, RPC: (i) the offender is a public officer; (ii) charged with the conveyance or custody of a prisoner, and (iii) the prisoner escapes through the officer's negligence.
- ****Arresto Mayor****: A correctional penalty that involves imprisonment for one month and one day to six months.
- ****Temporary Special Disqualification****: A penalty that disallows the person from holding public office, the right to vote, and participation in public elections for a period.
- The duty of vigilance over detainees extends to preventing any circumstances that could facilitate their escape.
- Legal provisions must be interpreted within the context of ensuring public safety and upholding the responsibilities of public officers.

Historical Background:

This case reflects the judiciary's stance on addressing and penalizing negligence within law enforcement, especially in the custody of detainees. It illustrates the Philippines' legal system's emphasis on the accountability of public officers and the rigorous expectations placed upon them in the performance of their duties.