

Title: People of the Philippines vs. Bernardo Quidato, Jr.

Facts:

Bernardo Quidato, Jr. was charged with parricide for the killing of his father, Bernardo Quidato, Sr., on September 17, 1988, in Kaputian, Davao, Philippines. The case was tried alongside a murder case against Reynaldo and Eddie Malita, who were employed by the victim and had withdrawn their “not guilty” plea during the trial, leaving only Quidato’s case to be tried on its merits. The prosecution’s evidence comprised witness testimonies, including Quidato’s own brother and wife, and the extrajudicial confessions of the Malita brothers, although they were not presented in court.

Bernardo Sr. and Quidato, along with the Malita brothers, sold copra in Davao City. Upon returning, Gina Quidato, the accused’s wife, overheard plans to rob Bernardo Sr. She testified despite objections based on marital disqualification, which the court limited to statements against the co-accused, not Quidato. The Malita brothers’ confessions detailed their plan and execution of the crime but were made in the absence of legal counsel, with signatures affixed after legal advice was provided the following day.

Quidato’s defense was a denial of involvement, claiming he was coerced by the Malita brothers under threat and did not witness the actual killing. He admitted to finding a bloodied bolo, which he claimed to have handed over to the police through his brother.

The Regional Trial Court of Davao found Quidato guilty of parricide and sentenced him to Reclusion Perpetua, citing the involvement and confessions of the Malita brothers as critical evidence.

Issues:

1. Whether the extrajudicial confessions of Reynaldo and Eddie Malita, which were not substantiated in court, violated Quidato’s constitutional rights to confront witnesses.
2. Whether the trial court erred in finding the existence of a conspiracy.
3. Whether the trial court erred in dismissing Quidato’s defense and not considering any possible motives of the Malita brothers.

Court’s Decision:

The Supreme Court reversed the trial court’s decision, emphasizing the inadmissibility of the Malita brothers’ extrajudicial confessions as they were considered hearsay due to their absence from the witness stand. It highlighted the violation of constitutional rights regarding the extrajudicial confessions made without counsel and noted the misapplication

of Gina Quidato's testimony against her husband due to marital disqualification. Without reliable evidence, the Court acquitted Bernardo Quidato, Jr. due to reasonable doubt concerning his involvement.

Doctrine:

The decision reiterated core legal principles regarding the admissibility of evidence:

- Extrajudicial confessions must be made with and attested by counsel to be admissible in court.
- Confessions made by co-accused are inadmissible against other accused unless made in the presence of the latter, allowing for cross-examination.
- The constitutional rights of an accused, including the right to confront witnesses and the inadmissibility of hearsay evidence in criminal trials.

Class Notes:

- **Extrajudicial Confessions**: To be admissible, confessions must be made with counsel present or appropriately waived in writing and in counsel's presence.
- **Hearsay Rule**: Statements or confessions by a co-accused are not admissible against another accused unless made under oath and with the opportunity for cross-examination.
- **Marital Disqualification Rule**: A spouse cannot testify against the other without their consent, except in specific exceptions.
- **Conspiracy Theory Application**: For the acts or declarations of a conspirator to be admitted against a co-conspirator, the conspiracy must be proven by evidence other than the act or declaration itself, and the statements must have been made during the existence of the conspiracy.

Historical Background:

This case underscores the judicial application of constitutional safeguards in criminal proceedings, particularly the rights of the accused to counsel during interrogation and the admissibility of evidence. It reflects the evolving legal standards in the Philippines concerning due process and the evidentiary rules governing confessions and testimonies, aligning with the principles of fairness and justice embedded in the legal system.