

****Title:**** *People of the Philippines vs. Roberto Samontañez y Dela Vega*

****Facts:**** On November 25, 1995, in Sitio Ilaya, Barangay Bunducan, Nasugbu, Batangas, 18-year-old Lolita delas Alas was found dead in a sugar cane plantation, naked and apparently raped before being killed. Roberto Samontañez was seen near the area before Lolita's body was discovered. No direct witnesses to the crime existed, but circumstantial evidence placed Roberto at the scene. The police arrested Roberto on November 28, 1995, at his workplace in Mendez, Cavite. During interrogation, without properly notifying him of his rights, Roberto allegedly admitted that Lolita's belongings were in his bag at his workplace. The evidence obtained led to his formal charge and arraignment for the crime of rape with homicide under Article 335 of the Revised Penal Code, as amended. Initially pleading not guilty, Roberto later changed his plea to guilty. The trial court required prosecutorial evidence to support the conviction despite the guilty plea, following the procedure for capital offenses.

****Issues:****

1. Was Roberto Samontañez's plea of guilty to the capital offense of rape with homicide made voluntarily and with full understanding of its consequences?
2. Did the trial court conduct a sufficient searching inquiry to ensure the voluntariness and understanding of Roberto's guilty plea?
3. Were the constitutional rights of Roberto properly observed during custodial interrogation and in the use of derived evidence (Lolita's belongings found in Roberto's bag)?

****Court's Decision:****

1. ****Voluntariness and Understanding of Guilty Plea:**** The Supreme Court found that the trial court failed to ascertain the voluntariness and full understanding by Roberto of the consequences of his guilty plea, particularly considering Roberto's initial not guilty plea and subsequent claim of being pressured by police.
2. ****Searching Inquiry:**** The Court determined that the trial court's searching inquiry was insufficient. Despite the transcripts showing lengthy interrogations, the Court was not convinced that these established Roberto's full comprehension of pleading guilty, especially given his inconsistent statements regarding understanding the plea's consequences.
3. ****Constitutional Rights and Evidence:**** The Supreme Court ruled that evidence derived from Roberto's custodial interrogation without advisement of his constitutional rights was

inadmissible. The confession and subsequent evidence (Lolita's belongings) were considered "fruit of a poisonous tree."

As a result, the Supreme Court annulled and set aside the decision of the Regional Trial Court and remanded the case for proper arraignment and retrial, ensuring Roberto's rights are respected in the process.

****Doctrine:**** The Supreme Court reiterated the doctrine that a guilty plea to a capital offense requires a thorough searching inquiry by the trial court, prosecutorial evidence to establish guilt and precise culpability, and the opportunity for the accused to present evidence. Additionally, it reinforced the principle that evidence obtained in violation of the accused's constitutional rights is inadmissible.

****Class Notes:****

- ****Capital Offenses and Guilty Pleas:**** When an accused pleads guilty to a capital offense, the trial court must conduct a searching inquiry into voluntariness and understanding, require prosecution evidence, and let the accused present evidence.
- ****Constitutional Rights during Interrogation:**** Evidence obtained without informing the accused of their rights (*Silanda vs. Miranda*) is inadmissible.
- ****Fruit of the Poisonous Tree Doctrine:**** Evidence derived from illegally obtained evidence is also inadmissible.

****Historical Background:**** The case underlines the judiciary's role in safeguarding the rights of individuals against coercive practices during investigation and prosecution, emphasizing the importance of procedural fairness and the admissibility of evidence. It also highlights the procedural safeguards in place for individuals accused of capital offenses, in line with evolving standards of justice and human rights.