

Title

****The People of the Philippines vs. Aurelio Balisacan****

Facts

Aurelio Balisacan stood accused of homicide following an incident on December 3, 1964, in Nueva Era, Ilocos Norte, Philippines, during which Leonicio Bulaoat was fatally stabbed. Charged with homicide in the Court of First Instance of Ilocos Norte on February 1, 1965, Balisacan entered a plea of guilty, aided by de officio counsel who subsequently petitioned for the presentation of evidence to establish mitigating circumstances. Balisacan claimed self-defense, asserting that Bulaoat was strangling him at the time of the stabbing, and noted his voluntary surrender to police post-incident. On March 6, 1965, his testimony led the trial court to acquit him.

The prosecution appealed the acquittal, initially directing the appeal to the Court of Appeals, which, after submission without an appellee's brief and having identified the involved questions as purely legal, certified the case to the Supreme Court on July 14, 1966. The Supreme Court docketed the case following a prosecution's brief filed on September 9, 1965, arguing against the erroneous acquittal despite a guilty plea.

Issues

1. Whether the trial court erred in acquitting Balisacan of the offense charged despite his plea of guilty.
2. Whether an appeal from an acquittal places the accused in double jeopardy.
3. Whether the testimony given to establish mitigating circumstances vacated the plea of guilty, necessitating a new plea.

Court's Decision

The Supreme Court found merit in the appellant's contention, emphasizing that a plea of guilty is an unconditional admission of guilt, necessitating the imposition of the corresponding penalty, with only mitigating circumstances considered. It highlighted the procedural error and deprivation of the prosecution's right to be heard by the trial court deciding on the merits without due evidence presentation.

On the issue of double jeopardy, the Court determined that a valid plea is a prerequisite for double jeopardy to apply. The Court concluded that Balisacan's subsequent testimony acted to vacate his plea of guilty, necessitating a new plea, which was not done, therefore eliminating double jeopardy concerns. The acquittal was deemed null and void for want of

due process.

The Supreme Court set aside the judgment of acquittal and remanded the case for new proceedings under a different judge in the Court of First Instance of Ilocos Norte, enabling a proper plea, trial, and judgment.

Doctrine

- A plea of guilty is an unconditional admission of guilt, requiring the imposition of the penalty dictated by law, excluding the consideration of guilt or innocence.
- The absence of a valid standing plea at the time of judgment precludes the application of double jeopardy.
- An acquittal rendered without due process is null and void and thus cannot serve as a basis for a claim of former jeopardy.

Class Notes

1. **Plea of Guilty:** Unconditional admission of all the facts charged and an acknowledgment of guilt.
 2. **Double Jeopardy:** Prohibits being tried again for the same offense after acquittal or conviction. Requires a valid plea as a prerequisite.
 3. **Mitigating Circumstances:** Factors that do not constitute a justification or excuse for an offense but may be considered to reduce the degree of moral culpability.
 4. **Due Process in Criminal Proceedings:** Ensures fair procedure, including the right of the prosecution to present its case and for the defense to respond.
- **Rule 119, Section 3, Rules of Court (Order of Trial)** and **Rule 122, Section 2, Rules of Court (Appeals in Cases of Acquittal)** are critical procedural guidelines highlighted by the case.

Historical Background

The case underscores the complex interplay between plea proceedings, mitigating circumstances, and the principles of double jeopardy within the Philippine legal system. It reflects the judiciary's careful balancing act in ensuring that justice is served, adhering to procedural correctness while safeguarding the rights of both the accused and the prosecution against any miscarriage of justice.