

Title:

People of the Philippines vs. Millano Muit et al.

Facts:

In the afternoon of 11 November 1997, Orestes Julaton brought Sergio Pancho, Sr. and others to Joseph Ferraer's house, where they disclosed their plan to use it as a "safehouse" for their kidnapping for ransom operations. They assured Ferraer of his share in the ransom money. Subsequently, they introduced additional conspirators and stored firearms at Ferraer's residence. The plan proceeded when the group received information that their target, identified by their insider, Romeo, was at a construction site. However, the initial attempt failed as the target did not appear.

On 2 December 1997, the group learned that their target was on-site and proceeded with their plan, abducting the victim with the aid of armed force and taking off in a blue Pajero. This abduction led to a police operation ensued in Lipa City, where the culprits engaged in a shootout with the police, resulting in the kidnappers' deaths, including the victim. Millano Muit was apprehended post-encounter. Ferraer became a state witness, providing crucial testimony. The accused were tried at the Regional Trial Court (RTC), where they were found guilty of kidnapping for ransom with homicide and carnapping based on substantial evidence including eyewitness testimonies, extra-judicial confessions, and the involvement in the conspiracy outlined by Ferraer and corroborated by forensic and documentary evidence.

Issues:

1. Whether the appellants were guilty beyond reasonable doubt of kidnapping for ransom with homicide and carnapping.
2. Whether the RTC properly found a conspiracy among the appellants in committing the crimes charged.
3. Whether the extrajudicial confessions of Pancho, Jr., Dequillo, and the testimony of Ferraer were credibly utilized in convicting the appellants.

Court's Decision:

The Supreme Court affirmed the RTC and the Court of Appeals' finding that appellants Muit, Pancho, Jr., Dequillo, and Romeo were guilty beyond reasonable doubt of kidnapping for ransom with homicide and carnapping. The Court found the evidence presented by the prosecution sufficient to establish the commission of the crimes and the active participation of the appellants. The totality of the circumstances, including the planning, execution of the

plan, and aftermath, evidenced by testimonies and corroborated by extrajudicial confessions, was held to conclusively establish the guilt of the appellants. The Court also ratified the existence of a conspiracy, holding each appellant liable for the acts of the other due to their concerted efforts to perpetrate the kidnapping and carnapping.

Doctrine:

- The Court reiterated the doctrine that where a conspiracy exists, the act of one is the act of all. Each conspirator is liable for the acts of his co-conspirators.
- The Court also discussed the significance of extrajudicial confessions in establishing the guilt of the accused, emphasizing that when made voluntarily and corroborated by other evidence, such confessions can be a basis for conviction.
- On the definition and elements of the crimes of kidnapping for ransom with homicide and carnapping as provided by the Revised Penal Code and the Anti-Carnapping Act of 1972.

Class Notes:

- **Kidnapping for Ransom with Homicide:** For a conviction, the prosecution must prove: (a) the accused is a private individual; (b) there was kidnapping or detention of another, depriving the latter of liberty; (c) the act of detention or kidnapping is illegal; and (d) any of the circumstances under Article 267 of the Revised Penal Code is present.
- **Carnapping:** Defined under Republic Act No. 6539 as the taking, with intent to gain, of a motor vehicle belonging to another without the latter's consent, or by means of violence against or intimidation of persons, or by using force upon things.
- **Conspiracy:** Requires unity of purpose and intention in the commission of the crime. Proof of conspiracy renders each conspirator responsible for the acts of others regardless of the extent of their individual participation.
- **Doctrine on Extrajudicial Confessions:** An extrajudicial confession, to be admissible and basis for conviction, must be voluntary and corroborated by evidence.

Historical Background:

In the Philippines, crimes involving kidnapping for ransom, especially with the resultant death or homicide, underscore severe concerns about public safety and order. The decision in this case reflects the judiciary's strict adherence to penal statutes against heinous crimes, aiming at maintaining law and order by imposing severe penalties on those found guilty. The case also exemplifies the legal procedures and evidentiary standards applied in criminal proceedings, including the treatment of conspiracy, extrajudicial confessions, and the

reliance on state witnesses.