

### ### Title

People of the Philippines v. Agustin Mangulabnan et al.

### ### Facts

On the night of November 5, 1953, in Barrio Tikiw, San Antonio, Nueva Ecija, the Pacson family was disturbed by gunfire. Vicente Pacson attempted to hide but was later found dead due to multiple gunshot wounds. Intruders, led by Agustin Mangulabnan, whom the witness Cipriana Tadeo identified, forcibly entered the Pacson residence. They stole various items and money while assaulting the residents. The crime resulted in the death of Vicente Pacson and various thefts. Cipriana Tadeo reported Mangulabnan's involvement to the police, leading to his apprehension and confession, though he later recanted part of his statement.

The case underwent preliminary investigation in the Justice of the Peace Court of San Antonio, Nueva Ecija, leading to the filing of charges against Mangulabnan and ten others for robbery with homicide in the Court of First Instance of Nueva Ecija. Mangulabnan was convicted and sentenced to reclusion perpetua and ordered to pay damages, while others were acquitted or remained at large. Mangulabnan's motion for a new trial based on allegedly newly discovered evidence was denied, solidifying his conviction and sentence.

### ### Issues

1. The admissibility of a post-mortem report as evidence despite being a carbon copy.
2. Validity of the motion for a new trial based on "newly discovered evidence."
3. Determination of the applicable crime and proper penalization within the context of robbery with homicide, considering the aggravating circumstances.

### ### Court's Decision

1. The Supreme Court deemed the post-mortem report admissible, noting that it had been signed by the examining physician, and Mangulabnan had not objected to its admission at trial.
2. The motion for a new trial was denied. The court applied established jurisprudence stating that newly discovered evidence must be such that it would probably change the judgment if admitted. The proposed new evidence did not meet these criteria.
3. The Court affirmed Mangulabnan's conviction for robbery with homicide under Article 294, No. 1, of the Revised Penal Code. The decision emphasized that aggravating circumstances such as nighttime, dwelling, abuse of superior strength, and with the aid of armed men necessitated a harsher penalty but settled on reclusion perpetua due to the lack of unanimity among justices for a death penalty.

### ### Doctrine

The case reaffirms the doctrine that for robbery with homicide under Article 294, No. 1 of the Revised Penal Code, the homicide need only occur “by reason or on the occasion of the robbery” to be considered as such, regardless of the details of the death’s occurrence. It also outlined strict criteria for what constitutes “newly discovered evidence” sufficient to merit a new trial.

### ### Class Notes

- **\*\*Robbery with Homicide (Article 294, No. 1, RPC):\*\*** A special complex crime where any homicide, whether intentional or by accident, occurring by reason or on the occasion of the robbery, is sufficient for a conviction.
- **\*\*New Trial on Grounds of Newly Discovered Evidence:\*\*** Requires showing evidence was discovered post-trial, couldn’t have been discovered with due diligence during the trial, is not merely cumulative or impeaching, and is of such weight that it could change the outcome.
- **\*\*Aggravating Circumstances:\*\*** Nighttime, dwelling, abuse of superior strength, and aid of armed men, can significantly affect the severity of sentencing in criminal cases.
- **\*\*Admissibility of Evidence:\*\*** Objections to the admissibility of evidence must be made at the appropriate time during the trial; failure to do so results in waiving those objections.

### ### Historical Background

This case occurred within the context of post-World War II Philippines, a period marked by social unrest and the beginning of the Hukbalahap movement, an armed guerrilla force originally established during Japanese occupation. By the 1950s, Hukbalahap members, often called “Huks,” were implicated in various criminal activities, including robbery and insurgency against the government. This historical backdrop likely influenced both the crime’s commission and the subsequent legal processes, illustrating the complexities of administering justice in times of social upheaval.