

### Title:

**\*\*People of the Philippines vs. Rodolfo de la Cruz\*\***

### Facts:

This case involves the tragic murder of Teodorico M. Laroya, Jr. and his two children, Karen Verona and John Lester, in their residence at Greenpark Village, Cainta, Rizal, on June 23, 1992. With no eyewitnesses to the crime, the investigation quickly focused on Rodolfo de la Cruz, a brother-in-law to Teodorico. De la Cruz was arrested on June 27, 1992, and during custodial interrogation, he purportedly confessed to the murders, which he later contested as being made without proper legal representation and under coercion.

### Procedural Posture:

De la Cruz was charged with multiple murder in Criminal Cases Nos. 92-8029, 92-8030, and 92-8031 by the Regional Trial Court, Branch 74, of Antipolo, Rizal. He pleaded not guilty and contested his conviction on the basis of his constitutional rights being violated during custodial interrogation. The Supreme Court took cognizance of his appeal, which pivoted on the admissibility of his extrajudicial confession.

### Issues:

1. Whether de la Cruz was afforded his constitutional rights during the custodial investigation.
2. The admissibility of the extrajudicial confession made by de la Cruz.
3. The sufficiency of the evidence, apart from the contested confession, to convict de la Cruz.

### Court's Decision:

The Supreme Court reversed the lower court's conviction, focusing intricately on the procedural flaws of the custodial investigation. It found that de la Cruz was not adequately informed of his rights, particularly regarding legal counsel's presence. Evidence suggested that the counsel provided during his confession was not of his choosing, nor was it proven that she adequately represented him or ensured his rights were not violated. Approaching the confession, the Court deemed it inadmissible as it stemmed from a process that failed to respect the constitutional safeguards for accused individuals under custodial investigation. Without the confession, the remaining evidence—chiefly circumstantial—was insufficient to uphold the conviction.

### Doctrine:

- The right of any person under investigation for the commission of an offense to be informed of his right to remain silent and to have competent and independent counsel, preferably of his own choice, is fundamental. Any confession obtained in violation of these rights is inadmissible in evidence.
- Jurisprudence mandates continuous assistance of counsel from the start of custodial investigation to safeguard the rights of the accused.

### Class Notes:

- **\*\*Constitutional Rights during Custodial Investigation\*\***: An accused must be informed in a language they understand about their right to remain silent, their right to counsel, and that anything said can be used against them in court. Additionally, if unable to afford counsel, one must be provided.
- **\*\*Admissibility of Confessions\*\***: A confession, to be admissible, must be made with full comprehension of one's rights and voluntariness, in the presence of competent and independent counsel.
- **\*\*Sufficiency of Evidence\*\***: The prosecution must rely on the strength of its evidence, not on the weakness of the defense. The presumption of innocence requires evidence beyond reasonable doubt for conviction.

### Historical Background:

This case underscores the constitutional protections afforded to accused individuals in custody, reflecting the Philippine judiciary's stringent stance on safeguarding these rights post-Miranda, highlighting the critical balance between effective law enforcement and the imperative to uphold human rights.