

Title: People of the Philippines vs. Isabelo Puno y Guevarra, alias “Beloy,” and Enrique Amurao y Puno, alias “Enry”

Facts:

On January 13, 1988, in Quezon City, Philippines, Maria Del Socorro Sarmiento y Mutuc was allegedly kidnapped for ransom by Isabelo Puno and Enrique Amurao. Both accused worked for Socorro, with Puno being her husband’s driver. Presenting themselves under false pretenses, Amurao entered Socorro’s vehicle, brandished a gun, and, along with Puno, demanded money. Initially, Socorro handed over P7,000, and subsequently, the accused demanded an additional P100,000. To facilitate this, Socorro drafted three checks. Throughout the ordeal, she was threatened and later made to ingest a pill, which she refused. Socorro managed to escape and the incident was reported to CAPCOM.

Following their arrest, Puno and Amurao were charged with kidnapping for ransom. The Regional Trial Court of Quezon City, in Criminal Case No. Q-57404, tried and eventually found both guilty. However, instead of kidnapping for ransom, they were convicted of robbery with extortion committed on a highway, punishable under Presidential Decree No. 532, imposing reclusion perpetua and ordering payment to Socorro for damages.

Issues:

1. Whether the accused-appellants committed kidnapping for ransom under Article 267 of the Revised Penal Code, a violation of Presidential Decree No. 532, or simple robbery under Article 294 of the Revised Penal Code.
2. Whether the conviction under Presidential Decree No. 532 is valid when the accused were charged under a different crime.
3. The applicability of Sections 4 and 5, Rule 120 of the Rules of Court regarding the offense proven being necessarily included in the offense charged.

Court’s Decision:

The Philippine Supreme Court set aside the trial court’s decision, convicting Isabelo Puno and Enrique Amurao of simple robbery under Paragraph 5, Article 294 of the Revised Penal Code. The Court reasoned that the principal motive of the accused was extortion of money through intimidation, not kidnapping. The Court highlighted that motives and specific intent play crucial roles in determining the crime committed. The act of taking with intimidation

immediately from Socorro does not equate to ransom in the context of kidnapping but indicates robbery. Thus, the Court imposed an indeterminate sentence of 4 years and 2 months of prision correccional, as minimum, to 10 years of prision mayor, as maximum.

Doctrine:

The Court reiterated the doctrine that the specific intent of malefactors, along with their motive, is essential in determining the nature of the crime committed, particularly distinguishing between the crimes of kidnapping for ransom, robbery with extortion, and simple robbery. Furthermore, it highlighted the principle that the crime proven, which includes the elements of the offense charged, does not prevent conviction for the offense necessarily included in the crime charged.

Class Notes:

1. **Elements of Robbery**: (a) Intent to gain, (b) unlawful taking of personal property belonging to another, (c) through intimidation or force upon a person.
2. **Presidential Decree No. 532 vs. Anti-Carnapping Act of 1972 and Anti-Cattle Rustling Law of 1974**: PD 532 addresses highway robbery/brigandage and does not modify or overrule specific provisions of the Revised Penal Code pertaining to robbery or kidnapping.
3. **Interpretation of Laws**: Avoidance of absurd results and the spirit or intent of the law should prevail over its literal wording.

Historical Background:

The decision underscores the distinction between kidnapping for ransom and robbery/extortion, reflecting on the interpretation and application of the Philippine legal framework regarding crimes against liberty and property. The case is illustrative of the complexities in classifying offenses that involve elements of multiple statutes, showcasing the judiciary's role in interpreting laws in accordance with established doctrines and principles.