

Title: People of the Philippines vs. Salvador Crisostomo and Inocencio Ragsac

Facts

On May 27, 1972, in the New Bilibid Prison at Muntinlupa, Rizal, Antonio Waje, a prisoner, was viciously attacked and stabbed multiple times by Salvador Crisostomo and Inocencio Ragsac. Crisostomo had previously given Waje PHP 62 to purchase cigarettes and sugar, but Waje claimed the money was lost, which led to an altercation where Waje insulted and challenged Crisostomo. Agitated, and swayed by past grievances, Crisostomo and Ragsac conspired to kill Waje, who had a prior record of killing prison guards and was part of rival gang. Around 9 AM, as Waje walked towards the Reception and Diagnostic Center, Crisostomo approached and stabbed him, assisted by Ragsac. Both continued stabbing Waje until he collapsed. Postmortem revealed seven fatal stab wounds.

Following their apprehension and while lying prone, Crisostomo and Ragsac were mauled by prison guards. They were treated for their injuries and during separate investigations each confessed to their participation in the crime, motivated by past killings by Waje and his role in a rival gang.

During trial, both defendants recanted their confessions, claiming that only Crisostomo acted in self-defense because Waje attacked him first. They alleged they were coerced into making confessions. Despite this, the court found them guilty beyond reasonable doubt of murder and sentenced both to death.

Issues

1. **Were the confessions made by Crisostomo and Ragsac admissible in court?**
2. **Was there substantial evidence to support the claims of conspiracy and treachery in the killing of Waje?**
3. **Did Crisostomo genuinely act in self-defense when he killed Waje?**
4. **Was Ragsac involved in the killing, or was he merely present at the scene?**

Court's Decision

1. **Admissibility of Confessions:** The Supreme Court held that the sworn statements made by Crisostomo and Ragsac were admissible. Although there was maltreatment by guards immediately after the incident, the statements given during the formal investigation by Tolentino Avelina, who was not implicated in the maltreatment, were made voluntarily. Also, these confessions were made before the new constitution (which required presence of counsel during custodial interrogations) came into effect.

2. **Conspiracy and Treachery:** The Court confirmed the presence of conspiracy and treachery. The deliberate meeting of Crisostomo and Ragsac at the kitchen, the simultaneous attack, and the manner of stabbing corroborated the premeditated plan to kill Waje. Treachery was established by the unannounced attack from behind, ensuring Waje was utterly defenseless.

3. **Self-Defense:** The defense of self-defense by Crisostomo was rejected. The Court found no unlawful aggression from Waje. The claim of attack with a weapon (“chaco”) was not substantiated, and the nature of wounds on Waje, including multiple stabs, did not align with an act of self-defense.

4. **Ragsac’s Involvement:** Evidence pointed out Ragsac’s active participation in the premeditated killing. His confession, corroborated by other evidence, as well as his own admission, cemented his role in the murder.

Doctrine

The Court reiterated key points:

- **Admissibility of Confessions:** Confessions are admissible if made freely and voluntarily, irrespective of the presence of counsel, pertinent only post-1973 constitution.
- **Conspiracy and Treachery:** Conspiratorial actions and treacherous acts manifest when individuals collectively execute crime making it defenseless for the victim.
- **Self-defense Necessity:** Actual and imminent threat is essential to justify self-defense.

Class Notes

- **Elements of Self-Defense:** Unlawful Aggression, Reasonable Necessity of Means, Lack of Provocation.
- **Conspiracy in Crime:** Agreed involvement in a criminal act; collective and simultaneous effort evidences complicity.
- **Treachery (Art. 14, RPC):** Sudden and unexpected attack eliminating any chance for the victim to defend.
- **Admissibility of Confessions:** Sec. 20, Art. IV (1973 Constitution) and pre-1973 provision differences in custodial investigation protocols.

Historical Background

- **Pre-1973 Custodial Interrogations:** Contextual importance lies in the procedural evolution post-Marcos era. The confessions’ admissibility criteria transition from merely voluntary statements to mandating counsel embodiment post the 1973 Constitution reform,

marking a pivotal shift ensuring rights during custodial interrogations.

The decision in this case reflects the precedent practices and interpretations of laws concerning confessions, treachery, and conspiracy, vital to the Philippines' criminal jurisprudence and the rights of the accused in custodial settings before constitutional reforms.