

Title: People of the Philippines vs. Anacleto Q. Olvis, Romulo Villarojo, Leonardo Cademas, and Dominador Sorela

Facts:

On November 11, 1976, an information was filed charging Anacleto Q. Olvis, Romulo Villarojo, Leonardo Cademas, and Dominador Sorela with the murder of Deosdedit Bagon. The alleged incident occurred on the evening of September 7, 1975, in Polanco, Zamboanga del Norte. The narrative unfolds as follows:

- September 7, 1975:** Deosdedit Bagon went missing after being last seen on his way home.
- September 9, 1975:** His siblings, Alfredo and Estrella Bagon, reported his disappearance to Captain Ruperto Encabo at the local Integrated National Police station.
- Same day:** The police found Sorela bearing scratches and subsequently took him for questioning. Sorela reportedly broke down and confessed to his involvement in the killing.
- Subsequent developments:** Sorela implicated Villarojo and Cademas, explaining that they killed Bagon on the orders of Anacleto Olvis for a reward of P3,000 each. Villarojo allegedly inflicted multiple fatal wounds on Bagon with a bolo.
- Bagon's body discovery:** Villarojo led the police to a shallow grave where they exhumed Bagon's cadaver.
- Re-enactment and Investigation:** Sorela, Villarojo, and Cademas were made to re-enact the crime. Evidence collected included a twenty-inch long bolo, a shovel, a nylon rope, and a sack.
- Multiple Confessions:** The three accused executed multiple confessions implicating Olvis as the mastermind; however, they later retracted these under NBI custody, where they denied Olvis's involvement.

The Regional Trial Court of Zamboanga Del Norte acquitted Olvis for lack of evidence and convicted the others, sentencing them to death.

Issues:

- Admissibility of Extrajudicial Confessions:** Whether the extrajudicial confessions given by the accused were admissible.
- Validity of Re-enactment Evidence:** Whether the re-enactment carried out by the accused under police custody was admissible.
- Self-defense and Liability:** Whether Romulo Villarojo acted in self-defense and

whether his admission of killing Bagon should stand.

Court's Decision:

1. **Extrajudicial Confessions:** The Supreme Court found that the extrajudicial confessions were inadmissible because they were made without the presence of counsel, violating the constitutional right of the accused.
2. **Re-enactment Evidence:** The court ruled the forced re-enactment inadmissible as it breached the constitutional protection against self-incrimination. The circumstances under which the re-enactment was conducted were coercive, thus invalidating the resulting evidence.
3. **Self-defense Claim by Villarojo:** The Court scrutinized Villarojo's claim of self-defense. The nature and extent of wounds inflicted on Bagon negated this claim. The Court found Villarojo guilty of homicide instead of murder due to a lack of aggravating circumstances like superior strength and nocturnity.

Doctrine:

1. **Right Against Self-Incrimination:** Any evidence obtained through coercive means or without proper legal counsel is inadmissible.
2. **Rights During Custodial Interrogation:** Detainees must be informed of their rights to remain silent and to legal counsel. Any waiver of these rights must be voluntary, knowing, and intelligent.

Class Notes:

1. **Admissibility of Confessions:** Effective waiver of the right to counsel must be made with full awareness of the possible consequences.
2. **Re-enactment and Self-incrimination:** Procedures requiring suspects to demonstrate incriminatory acts are inadmissible if performed under duress or without counsel.
3. **Self-Defense:** Requires imminent threat to life; excessive force beyond necessity invalidates the claim.

Relevant Statutes:

- **1973 Constitution, Art. IV, Sec. 20:** No person shall be compelled to be a witness against himself.
- **Doctrine from People v. Decierdo:** confessions without counsel are involuntary.

****Historical Background:****

During the 1970s in the Philippines, the justice system was grappling with adherence to constitutional guarantees against self-incrimination against a backdrop of political tension and martial law. This case reflects the socio-political environment where law enforcement procedures were under intense scrutiny for violations of human rights. The Supreme Court's decision reaffirms its commitment to enforce constitutional protections and due process, especially regarding custodial investigations and the rights of the accused.