

Title:

The People of the Philippines vs. Emerito Abella Alias Kulot, et al.

Facts:

On June 27, 1965, a violent riot occurred in the Davao Penal Colony. The incident started shortly before noon when prisoner-trustee Numeriano Reynon was on duty. He was overpowered and attacked by Leocadio Gavilaguin and others from the small confinement cells who wanted to gain access to the big cell. They assaulted Reynon, grabbed the keys, and opened the door of the big cell. Seventy-five prisoners were confined in the congested big cell, while seventeen “close-confined” prisoners were held in three smaller cells.

These prisoners belonged to two rival gangs, the Oxo gang, consisting mainly of Visayans, and the Sigue-Sigue gang from Luzon. Using improvised weapons, the raiders launched an attack against the members of the Sigue-Sigue gang in the big cell. Orders were barked, such as “Visayans go to the sides,” implying a premeditated plan to separate and attack specific groups.

During the hour-long melee, prison officials, unable to break through the locked cell, could only witness helplessly from outside. Fourteen prisoners were killed on the spot or succumbed shortly after due to fatal injuries, while others sustained serious injuries. Following the riot, weapons were surrendered, and the instigators identified.

Procedural Posture:

* **July 1965:** Inmate statements were collected.

* **September 24, 1965:** Formal charges were filed by prison officials in the municipal court of Panabo.

* **October 22, 1965:** The Provincial Fiscal’s office filed an information charging thirty-seven prisoners with multiple murder and multiple frustrated murder.

* **March 5, 1966:** The accused were arraigned, with nineteen pleading guilty.

* **1966-1969:** Trials commenced for those pleading not guilty, leading to convictions and sentencing.

* **October 1969 - 1976:** Hearings continued, death sentences were periodically upheld or reviewed, and some accused died.

* **1981:** Supreme Court of the Philippines undertook automatic review of the death sentences.

Issues:

1. **Improvidence of Plea:** Whether the plea of guilty made by the accused was undertaken with full understanding and comprehension of its consequences.
2. **Nature of the Crime:** Whether the killings and injuries should be treated as multiple separate crimes or a single complex crime.
3. **Application of Aggravating Circumstances:** Whether the aggravating circumstances such as treachery, evident premeditation, and quasi-recidivism were appropriately considered.
4. **Validity of Extrajudicial Confessions:** Whether the extrajudicial confessions should be considered valid evidence of guilt.
5. **Clemency Consideration:** Whether the death sentences should be commuted to reclusion perpetua given the inhumane prison conditions.

Court's Decision:

1. **Improvidence of Plea:** The Court found that the trial judge had the discretion to determine if the guilty plea was entered with full knowledge. The procedures followed ensured that the accused understood the significance of their plea.
2. **Nature of the Crime:** The Court held that the killings and injuries constituted a complex crime of multiple murder and multiple frustrated murder. Unlike the Solicitor General's argument, the precedent set in the De los Santos case supported treating the acts as a single offense due to their interconnected execution.
3. **Application of Aggravating Circumstances:** The Supreme Court upheld the trial court's consideration of treachery, evident premeditation, and quasi-recidivism. The deliberate planning and execution of the massacre affirmed the aggravating circumstances.
4. **Validity of Extrajudicial Confessions:** The Court validated the confessions, noting that they were corroborated by other evidence of the corpus delicti and made before the 1973 Constitution, thus not affected by its stringent requirements.
5. **Clemency Consideration:** The Supreme Court recognized the deplorable conditions of the prison that might have driven the inmates to violence. The death penalty was reduced to reclusion perpetua, considering these mitigating circumstances and following precedents.

Doctrine:

- * **Complex Crime:** Multiple actions in the pursuit of a single criminal intent are considered a single complex crime.
- * **Plea of Guilty:** It is within the judge's discretion to decide if a plea of guilty was made knowingly and voluntarily, supplemented by corroborative evidence.
- * **Humanitarian Consideration:** The acknowledgment of inhumane prison conditions impacts the severity of sentences, emphasizing justice tempered with mercy.

Class Notes:

1. **Complex Crime:** Article 48 of the Revised Penal Code - Multiple acts executed with a single criminal purpose form one complex crime.
2. **Recidivism and Quasi-Recidivism:** Articles 14 and 160 of the Revised Penal Code - Aggravating circumstances that impact the sentencing severity.
3. **Doctrine of Precedents:** Consistent application of past rulings in similar circumstances, such as the De los Santos case.
4. **Treachery and Evident Premeditation:** Article 14(16) and (13) - Conditions under which these aggravating circumstances are deemed to exist.

Historical Background:

The case recalled the tumultuous conditions within Philippine penal institutions during the 1960s, explicitly exposing precarious, overcrowded, and inhumane living conditions leading to heightened inmate violence, gang rivalries, and uprisings. Moreover, this scenario paralleled the tragic Muntinlupa riot in 1958, emphasizing systemic issues within the national prison system and the habitual recurrence of similar violent outbreaks.