

### Title:

People of the Philippines vs. Angeles Sta. Teresa

### Facts:

1. **Incident and Complaint:** In October 1996, Angeles Sta. Teresa allegedly raped his 12-year-old daughter, Lorna Sta. Teresa, in Barangay Soledad, Nueva Ecija. Lorna filed a complaint, leading to Angeles being charged with rape on March 10, 1997.
2. **Arraignment:** The accused pleaded “not guilty” during his arraignment on May 7, 1997, with the assistance of his counsel, Attorney Angelito Adriano.
3. **Prosecution’s Case:** The prosecution presented Dr. Maria Lorraine De Guzman, a medico-legal officer, and the rape victim, Lorna, as witnesses.
4. **Change of Plea:** On May 16, 1997, the accused withdrew his “not guilty” plea, changing it to a guilty plea, claiming he did not intend to commit the act due to being drunk and not in his right mind.
5. **Trial Court Procedure:** The trial court, with the defendant’s counsel present, re-read and explained the charges to Sta. Teresa. The courts admitted all the prosecution’s evidential exhibits despite objections from the defense. Sta. Teresa testified, reiterating his request for leniency or pardon due to drunkenness.
6. **Conviction and Automatic Review:** The Regional Trial Court of Cabanatuan City, Branch 27, found Sta. Teresa guilty of rape and sentenced him to death on May 28, 1997. The case was brought before the Supreme Court for automatic review.

### Issues:

1. **Plea of Guilty:** Did the trial court err in accepting the accused’s plea of guilty as voluntary and fully comprehended?
2. **Due Process:** Were the due process rights of the accused adequately protected, particularly the effectiveness of legal representation?
3. **Testimony and Evidence:** Were the inconsistencies and improbabilities in the complainant’s testimony significant enough to affect the conviction?

### Court’s Decision:

1. **Plea of Guilty and Due Process Rights:**
  - The trial court failed to conduct an adequate “searching inquiry” into the voluntariness

and full understanding of the consequences of Sta. Teresa's guilty plea as required for capital offenses.

- The defense counsel's performance was found lacking, reflecting inadequate legal assistance which violates constitutional due process standards. His immediate and unopposed change of plea, lack of preparation, and non-appearance during the decision promulgation underscored his ineffective representation.

## 2. **Presentation of Evidence:**

- The trial court was deficient in letting the prosecution rest its case after initial witnesses testified, not seeking further evidence from the appellant effectively.

- Prosecution's evidence and the accused's inadequate defense were insufficient for a legitimate conviction under constitutional mandates.

### **Doctrine:**

- **Search Inquiry and Due Process in Capital Offenses:** When an accused pleads guilty to a capital offense, the court is mandated to ensure the plea is voluntary, comprehended by the accused in full, and to continue requiring the prosecution to present evidence, and to allow any defense evidence by the accused.

- **People v. Alicando:** Emphasized the need for such "searching inquiry".

### **Class Notes:**

- **Elements of Due Process in Criminal Trials:**

- The right to a fair, full, and competent legal defense.

- The necessity for a voluntary and fully understood plea of guilty.

- Proper presentation and weighing of prosecution and defense evidence.

- **Section 3, Rule 116, Revised Rules of Criminal Procedure:** Requirement for a detailed judicial inquiry when a plea of guilty is entered for capital offenses.

- **Ineffective Counsel:** Defense must be active, committed, and well-prepared to ensure judicial processes protect the accused's rights.

- **People v. Bermas:** Highlights the due process standard for the counsel's duty to actively defend the accused.

### **Historical Background:**

- **Legal Evolution on Pleas in Capital Cases:** The jurisprudence has increasingly emphasized protection of the accused's fundamental rights against improper guilty pleas in capital offenses, reflecting a broader narrative of evolving criminal justice and human rights

standards.