

### Title: People of the Philippines vs. Decena Masinag Vda. de Ramos

### Facts:

On July 17, 1992, the lifeless bodies of spouses Romualdo Jael and Leonila Caringal were discovered in their home in Lucena City. An investigation revealed that a robbery had taken place, during which various valuable items were stolen and the victims brutally killed. The accused - Decena Masinag Vda. de Ramos, Isagani Guittap y Pengson, Wilfredo Morelos y Cruz, Cesar Osabel, Ariel Dador y De Chavez, Luisito Guilling, and an unidentified individual (John Doe @ Purcino) - were implicated in this crime.

State witness Ariel Dador, who was involved in the crime but discharged to testify against the others, recounted that on July 15, 1992, Cesar Osabel discussed a plan with Masinag to rob the Jael spouses, deeming them easy targets as they were old and wealthy. On July 16, 1992, Osabel, Dador, and Purcino executed the plan; Osabel and Purcino entered the house while Dador stayed outside. Screams were heard from inside, and later Osabel and Purcino exited the house with stolen items, bloodied hands, and informed Dador of the murders committed to prevent being reported.

Dador's confession and Osabel's corroborative statements implicated Masinag as a conspirator, but during the trial, Osabel recanted his extrajudicial confession, claiming coercion. The trial court found the confessions credible and convicted Osabel and Masinag of Robbery with Homicide, sentencing them to reclusion perpetua and ordering indemnification to the heirs of the victims.

Masinag appealed her conviction, arguing that there was insufficient evidence of her involvement in the conspiracy beyond hearsay and coerced testimonies.

### Issues:

1. Whether the extrajudicial confessions of Osabel and Dador were sufficient to establish the guilt of Decena Masinag Vda. de Ramos in the conspiracy.
2. Whether the trial court erred in appreciating the hearsay evidence against Masinag.

### Court's Decision:

The Supreme Court examined the sufficiency and admissibility of the evidence against Masinag:

1. **\*\*Insufficiency of Extrajudicial Confessions\*\***:

The Court held that Dador's testimony was not based on personal knowledge but merely on

what Osabel had told him. Thus, his statements were hearsay and inadmissible as evidence against Masinag. Furthermore, Osabel's extrajudicial confession, initially implicating Masinag, was repudiated in court. Under the *res inter alios acta* rule, Osabel's confession could not bind Masinag absent independent evidence of her participation in the conspiracy, which the prosecution failed to present.

## 2. **Hearsay Evidence**:

The Court reaffirmed the inadmissibility of hearsay evidence under Rule 130, Section 36 of the Rules of Court. Dador's statements, being hearsay, lacked probative value, and the trial court erred in using them against Masinag.

No overt act was proven that linked Masinag directly to the conspiracy. Therefore, the prosecution did not meet the burden of proving Masinag's guilt beyond a reasonable doubt.

### ### Doctrine:

- **Res inter alios acta rule**: An extrajudicial confession is binding only upon the confessant and not admissible against co-accused. There must be independent evidence proving conspiracy besides such confessions.
- **Hearsay Rule**: Hearsay evidence is inadmissible due to lack of personal knowledge by the witness. As reinforced in Rule 130, Section 36 of the Rules of Court, evidence must be based on the witness's personal perception.

### ### Class Notes:

- **Res inter alios acta rule** (Rule 130, Section 25, Rules of Court): Rights of a party cannot be prejudiced by others' declarations.
- **Hearsay Rule** (Rule 130, Section 36, Rules of Court): Testimony must be based on personal knowledge.
- Examination of witnesses' credibility and basis of knowledge is crucial in determining the weight and admissibility of their statements.
- **Conspiracy**: Must be proven through overt acts indicating a joint purpose and collective intent to commit a crime.

### ### Historical Background:

The case occurred in the early 1990s, a period characterized by economic challenges in the Philippines, with high crime rates among desperate individuals targeting older, wealthier citizens. The case underscores the judicial emphasis on the credibility and personal knowledge of witnesses in criminal convictions, preserving the rights of the accused amidst

extrajudicial confessions prevalent at the time. The Supreme Court's reinforcement of the hearsay rule and the *res inter alios acta* doctrine highlights the judiciary's vigilance in ensuring convictions are based on sound, independent evidence.