

**\*\*Title: People of the Philippines vs. Timoteo Cabural, et al.\*\***

**\*\*Facts:\*\***

On September 14, 1960, at around 2:00 AM, three masked men entered the Kim San Milling building in Palao, Iligan City through an opening in the roof. Inside the building, they hogtied four men — Pua Lim Pin, Bebencio Palang, Sy Chua Tian, and Siao Chou, at gunpoint. They covered the victims with blankets and ransacked the cabinets. During this time, the robbers demanded access to the safe, threatening to kill if the safe wasn't opened by 4:00 AM. Meanwhile, in another room, Restituta Biosano, Panchita Maghanoy, and Agripina Maglangit were similarly bound. Agripina was later taken outside by one of the men and raped.

After the incident, it was reported that cash and personal belongings amounting to P9,435.50 were stolen. Subsequent investigations led to the arrest of the accused Benjamin Lasponia, Leonide Cabual, Ciriaco Yangyang, and Timoteo Cabural. Each one of them signed confessions detailing their participation, although the appellants later claimed these confessions were extracted under duress.

**\*\*Procedural Posture:\*\***

The accused were charged before the Court of First Instance of Lanao del Norte with the crime of Robbery in Band with Rape. During the trial, some accused were dropped from prosecution upon the City Fiscal's petition, leading to the trial continuing against Timoteo Cabural, Benjamin Lasponia, Leonide Cabual, and Ciriaco Yangyang. They were found guilty, with severe penalties imposed. Only Cabural and Yangyang appealed the decision, questioning the trial court's admission of their extra-judicial confessions and their identification.

**\*\*Issues:\*\***

1. Whether the extra-judicial confessions of the accused, obtained allegedly under coercion, were admissible as evidence.
2. Whether the interlocking confessions of the accused were sufficient to justify their convictions.
3. Whether the identification of appellant Timoteo Cabural as the rapist was sufficient to uphold his conviction.
4. Whether the prosecution met the legal standard of proving guilt beyond a reasonable doubt.
5. Applicability of Article 335 vs. Article 294(2) of the Revised Penal Code in sentencing.

**Court's Decision:**

1. **Admissibility of Confessions:** The Court upheld the trial court's finding that the confessions were obtained without coercion and thus, admissible. Fiscal Magsalin's testimony corroborated the voluntariness of these confessions.
2. **Interlocking Confessions:** The Court found that these confessions were consistent and detailed, revealing specifics only the participants would know. These details helped substantiate the guilty verdicts.
3. **Identification of Cabural:** Agripina Maglangit's testimony identifying Cabural as her attacker was found to be credible and compelling. The Court noted her eyewitness account was clear and detailed.
4. **Proof Beyond Reasonable Doubt:** The Court, considering both the confessions and the testimonies of the witnesses, held that the evidence against Cabural and Yangyang met the threshold required for criminal conviction.
5. **Sentencing under the Revised Penal Code:** The Court determined that robbery with rape should be penalized under Article 294(2), a crime against property, thus affirming Cabural's sentence of reclusion perpetua. Discrepancies in judicial opinions regarding penalties under Article 335 for rape committed during robbery were noted but did not alter the outcome for Cabural.

**Doctrine:**

- **Application of Article 294(2):** Robbery with rape is punishable under Article 294(2) of the Revised Penal Code, categorizing it as a crime against property rather than a private offense under Article 335.
- **Admissibility of Confessions:** Extra-judicial confessions are admissible if made voluntarily and corroborated by independent and credible testimonies.
- **Interlocking Confessions:** Mutually corroborative confessions among co-accused can establish guilt beyond reasonable doubt, even in the absence of the primary testimony of coercion.

**Class Notes:**

- **Elements of Robbery with Rape (Art. 294[2] RPC):** The robbery must include (1) intent to gain, (2) illegal taking of personal property, (3) intimidation or violence, and (4) rape.
- **Voluntary Confession:** A confession must be voluntarily made to be admissible as evidence and carries crucial weight if detailed and corroborated.

- **Eyewitness Identification:** Positive identification by a victim or credible witness can significantly support the conviction in rape cases.

**Historical Background:**

During the 1960s, governance under President Carlos P. Garcia and later Diosdado Macapagal was marked by efforts to maintain law and order amidst political and social challenges. This case illustrates the judiciary's stance on property crimes involving violence, emphasizing stringent penalties and legal adherence to procedural rigor in criminal law, reflecting the evolving jurisprudence on crime classification and punishment consistency.