

**\*\*Title:\*\*** People of the Philippines vs. Federico Alba, G.R. No. L-2799

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

Federico Alba, a Filipino citizen, was accused of treason before the Court of First Instance of Rizal following the dissolution of the People's Court, charged by means of an information containing four counts. He was acquitted on counts 2 and 3 but convicted on counts 1 and 4, sentenced to reclusion perpetua with accessory penalties, a fine of P10,000.00, and costs, with credit of half of the preventive imprisonment. He subsequently appealed the conviction.

**\*Count 1:\***

In November 1944, around 2 a.m., Alba, with companions, went to Pablo Maranan's house in Bulobulo, Pililla, Rizal, and abducted Antonio Maranan, suspected of guerrilla involvement. Pablo Maranan and others, followed by Faustino Pilarion, pursued them to Pililla. On the way, they met Quirino Vidanes, who confirmed seeing Antonio as a captive. That night, Alba was seen leading Marcelo Bisco, Maximo Agencia, and Antonio, their hands tied. The three were later found dead in a common grave after liberation, identified based on Alba's information to Pilarion during his arrest and interrogation.

**\*Count 4:\***

On January 24, 1945, the Chief of Police of Tanay, following Alba's orders, arrested Dr. Mamerto Anihin and brought him to Alba at a rice mill, where other prisoners, including Teodulo Bernados and Dominador Jacinto, were held. Further, Aproniano Ferrer, compelled under torture ordered by Alba, identified Anihin and others as guerrillas. Subsequently, prisoners were tortured, tied, and transported to Pililla, where they underwent further brutality. Ferrer died from the repeated beatings. Anihin and others were released after about ten days.

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

1. **\*\*Credibility of Witnesses:\*\*** Are the testimonies of the prosecution witnesses reliable despite alleged contradictions?
2. **\*\*Mitigation of Penalty:\*\*** Should Alba's lack of education and human weakness mitigate his penalty?

**\*\*Court's Decision:\*\***

1. **\*\*Credibility of Witnesses:\*\***

- The Court found no substantial reason to doubt the credibility of the witnesses. The supposed contradictions were minimal, either explainable by the passage of time or seen as

reinforcing the authenticity of separate testimonies rather than indicating collusion. Therefore, the witnesses' accounts were deemed credible and corroborative of the charges against Alba.

2. **Mitigation of Penalty:**

- The Court rejected the request for mitigation based on lack of education and human weakness. It held that basic human understanding and morals were sufficient to comprehend the gravity of Alba's acts, including torture and execution of individuals fighting for liberation.

In conclusion, the Court affirmed the decision of the lower court, confirming Alba's conviction and sentence.

**Doctrine:**

The case underscores that credible witness testimony, even with minor inconsistencies, can sustain a conviction if the inconsistencies do not materially alter the essence of the narrative or suggest collusion. Additionally, basic morality and human ethics necessitate the rejection of mitigation claims grounded solely in lack of formal education, particularly involving heinous acts.

**Class Notes:**

- **Credibility of Witnesses:** Minor inconsistencies do not necessarily undermine credibility. (People of the Philippines vs. Federico Alba)
- **Mitigation of Penalty:** Lack of education does not justify mitigation in cases of severe crimes involving moral turpitude.
- **Treason:** Defined under Article 114 of the Revised Penal Code.
- **Accessory Penalties:** Reclusion perpetua entails accessory penalties, including civil interdiction and perpetual absolute disqualification.

**Historical Background:**

This case occurred during the Japanese occupation of the Philippines in World War II. Guerrilla activities were part of the Filipino resistance against Japanese forces. The collaboration with Japanese forces, as exhibited by Alba and the Makapili soldiers, led to post-war treason trials, including this case, reflecting the historical context of punishment for acts against national liberation efforts.