

Title:

People of the Philippines v. Jaime Jose y Gomez, Basilio Pineda, Jr., et al.

Facts:

On June 26, 1967, at approximately 4:30 AM, Magdalena “Maggie” de la Riva, a popular movie actress, was driving home from the ABS Studio in Pasay City, accompanied by her maid Helen Calderon. As they neared her house in New Manila, Quezon City, a Pontiac convertible carrying four men (identified later as Jaime Jose, Basilio Pineda, Jr., Edgardo Aquino, and Rogelio Cañal) tried to bump Maggie’s car. Frightened, Maggie and her maid screamed for help, but Basilio Pineda forcibly dragged her out of her car and into the Pontiac, despite Maggie’s resistance.

Inside the vehicle, Maggie was threatened, blindfolded, harassed physically and verbally, and brought to the Swanky Hotel in Pasay City. Forced into a room, the four men took turns raping her over a period of time using violence and threats. Afterward, they blindfolded her again and dropped her near the Free Press Building, warning her not to inform anyone about the assault.

Maggie reached her home and informed her mother of the rape. At her family’s decision, the crime was reported to the Quezon City Police Department on June 29. Detailed investigations led to the arrest of the four men who confessed to varying degrees of involvement.

Procedural Posture:

The defendants were charged with the crime of forcible abduction with rape. Basilio Pineda, Jr. pleaded guilty, while Jaime Jose, Edgardo Aquino, and Rogelio Cañal pleaded not guilty and went to trial. The lower court found all four defendants guilty and sentenced them to death. The case reached the Supreme Court on automatic review due to the imposition of the death penalty.

Issues:

1. Whether the acts of Jaime Jose, Edgardo Aquino, and Rogelio Cañal constitute forcible abduction with rape.
2. Whether the rape was consummated by each of the accused.
3. Whether voluntary extrajudicial confessions were made by Jose and Cañal.
4. Whether the car used in the crime can be legally confiscated given the intervenor’s claim by Filipinas Investment & Finance Corporation.

Court's Decision:

1. **Forcible Abduction with Rape:** The Supreme Court confirmed the lower court's ruling that all defendants acted in conspiracy and forcibly abducted Maggie with lewd designs, resulting in her being raped by each one of them.
2. **Consummation of Rape:** The Court dismissed the contention regarding the absence of semen in Maggie's vagina, pointing out accepted medical opinion and evidence of physical struggles and genital injuries.
3. **Extrajudicial Confessions:** The Court considered the confessions of Jose and Cañal to have been made voluntarily, dismissing the claims of force and intimidation. The statements provided detailed accounts of the crime not normally known to investigators.
4. **Confiscation of the Car:** The Court held that the Pontiac used in the crime should not be confiscated as it was under a chattel mortgage to Filipinas Investment & Finance Corporation and registered in the name of Dolores Gomez.

Doctrine:

- **Conspiracy in Commission of Crimes:** The collective action towards a criminal objective was sufficient to hold each accused responsible for the crimes collectively.
- **Efficiency and Integrity of Extrajudicial Confessions:** Admissions made voluntarily, even without the presence of legal counsel, could stand as competent evidence in the circumstances then extant in the Philippine legal context.

Class Notes:

- **Conspiracy (Art. 8, RPC):** When conspirators act with a common unauthorized plan, the act of one can be attributed to all.
- **Forcible Abduction with Rape (Art. 335, RPC):** Constituted by the use of force, intimidation, or deceit in abductions resulting in sexual assault.
- **Medico-Legal Evidence:** Confirmatory signs of rape need not include the presence of spermatozoa within a certain timeframe after the crime.
- **Article 45, RPC:** Prohibits the confiscation of a property used in a crime if the property belongs to a third party not involved in the offense.

Historical Background:

The case of Maggie de la Riva attracted widespread media attention and caused public outrage in the Philippines due to its brutality and the personalities involved. It highlighted issues of violence against women and the protracted struggle for justice in the face of socio-cultural obstacles and criminal conspiracies. The Supreme Court's decision underscored issues of procedural integrity and juridical interpretation of reprehensible conduct, shaping

future considerations in similarly grave criminal cases.