

Title: *The United States vs. Apolonio Caballeros et al.*

Facts:

On a date not specified in the decision, American school-teachers Louis A. Thomas, Clyde O. France, John E. Wells, and Ernest Eger were assassinated or murdered. Subsequent to the killings, Roberto Baculi and Apolonio Caballeros were implicated in the burial of the victims' corpses, ostensibly to conceal the crime. Baculi confessed to assisting in the burial but claimed he was coerced by the murderers, Damaso and Isidoro, who threatened him with violence. This testimony was corroborated by Teodoro Sabate, the only eyewitness, who confirmed Baculi's coerced involvement and absolved him from any voluntary participation in the crime.

There was no evidence implicating Apolonio Caballeros in the execution or concealment of the murders; he was not present at the site of the burial. Nonetheless, the trial court found both Baculi and Caballeros guilty and sentenced them to seven years of presidio mayor as accessories after the fact in the crime of assassination or murder.

Procedurally, the case began in the Court of First Instance of Cebu, which convicted the defendants. The defendants appealed the decision, leading to the review by the Supreme Court of the Philippines.

Issues:

1. Whether Roberto Baculi's coerced participation in the burial of the corpses constitutes a criminal liability as an accessory after the fact.
2. Whether the supposed confessions of Apolonio Caballeros, given under conditions of promise for leniency and possibly coercion, can be considered legal proof of guilt.

Court's Decision:

1. ****Issue on Roberto Baculi's Liability:****
 - The Court held that Roberto Baculi's act of burying the corpses under the threat of violence from Damaso and Isidoro fell under the exemption for acts performed under "irresistible force" as per paragraph 9, Article 8 of the Penal Code. His coerced actions do not make him criminally liable since he was compelled by the murderers, and this compulsion was corroborated by a prosecution witness. Thus, Baculi was acquitted.
2. ****Issue on Apolonio Caballeros' Confession:****
 - The Court found that the confession by Apolonio Caballeros was invalid. Enrique Calderon, an officer of the Constabulary, testified that Baculi confessed voluntarily, but Caballeros

made his confession under the promise of leniency, which rendered it inadmissible under Section 4, Act No. 619 of the Philippine Commission. There was no other evidence proving Caballeros' involvement, and thus the confession could not be considered lawful evidence. Moreover, testimonies from witnesses confirmed that Caballeros did not participate in the burial nor was he present at the crime scene. Consequently, Caballeros was also acquitted.

****Doctrine:****

- The case reaffirmed the principle that actions performed under "irresistible force" (Paragraph 9, Article 8 of the Penal Code) are not grounds for criminal liability.
- It also reinforced the legal requirement for confessions to be made freely and voluntarily, without any form of external inducement, threat, or promise of pardon, as mandated by Section 4, Act No. 619 of the Philippine Commission.

Class Notes:

- ****Irresistible Force:**** Paragraph 9, Article 8 of the Penal Code exempts individuals from criminal liability if they act under conditions of irresistible force.
- ****Voluntary Confession:**** Section 4, Act No. 619 of the Philippine Commission states that only confessions made freely and voluntarily, without any force, intimidation, or promise of pardon, can be accepted as evidence in trial.
- ****Accessory After the Fact:**** Refers to individuals who assist in the concealment of a crime post-execution, but must not have acted under coercion or threat.

Historical Background:

- The events occurred during the American colonial period in the Philippines, a time when strict enforcement of the Penal Code and safeguarding the rights of accused individuals were pivotal in the judicial system. The ruling illustrates the application of these legal protections even amid efforts to enforce colonial law order and underscores the judicial commitment to due process and the proper administration of justice.