

Title:

People of the Philippines v. Vicente Lugnasin and Devincio Guerrero

Facts:

On April 20, 1999, at around late evening in Quezon City, Nicassius Cordero was abducted while opening the garage door of his residence by three armed men. The abductors, Vicente Lugnasin and Devincio Guerrero among them, forcibly took Cordero to a vehicle. Vicente Lugnasin later joined at the South Luzon Expressway and took over as the driver, identifying himself as "Commander." After arriving at a small house in the Municipality of Tanauan, Batangas, Cordero was detained for four days. The abductors demanded a ransom of 30 million pesos from Cordero's family for his release. On the evening of April 24, 1999, Cordero was eventually released without any ransom being paid.

Subsequently, on October 15, 1999, the Department of Justice filed an Information charging Vicente and Devincio, along with other participants, with kidnapping for ransom under Article 267 of the Revised Penal Code.

Vicente and Devincio were arrested and detained under various charges unrelated to the kidnapping. They consistently denied involvement, asserting that the identification was flawed and their arrests were illegal.

The RTC of Quezon City found both accused guilty beyond reasonable doubt and sentenced them to death. This was later modified by the Court of Appeals to reclusion perpetua without the possibility of parole.

Issues:

1. **Credibility of Lone Witness**: Whether the testimony of Nicassius Cordero, particularly his identification of Vicente Lugnasin and Devincio Guerrero, was credible.
2. **Suggestiveness in Identification**: Whether the identification process of the accused was tainted with suggestiveness.
3. **Legality of Warrantless Arrest**: Whether the warrantless arrest of Devincio Guerrero was lawful.
4. **Violation of Republic Act No. 7438**: Whether Devincio Guerrero's rights under Republic Act No. 7438 were violated during detention and investigation.

Court's Decision:

1. **Credibility of Lone Witness**:
 - The Supreme Court upheld the trial court's assessment of Nicassius Cordero's testimony

as credible, finding his detailed and coherent narrative trustworthy. His demeanor and consistent recollection of the abduction events bolstered the credibility of his account.

2. **Suggestiveness in Identification**:

- The identification process was reviewed under the “totality of circumstances” test. Cordero had sufficient opportunity to observe the faces of his captors due to the lighting conditions and other circumstances of the crime. No undue suggestion was present during the identification process, which was carried out correctly and without any undue influence.

3. **Legality of Warrantless Arrest**:

- It was ruled that the challenge to Devincio’s arrest was waived as he failed to raise the issue before arraignment, which constitutes a submission to the trial court’s jurisdiction regardless of the arrest’s legality. Thus, the valid judgment stands.

4. **Violation of Republic Act No. 7438**:

- The Court found no concrete evidence showing that Devincio’s rights under Republic Act No. 7438 were violated. The absence of extrajudicial confession during detention indicated no direct prejudice from any alleged rights violation.

Doctrine:

1. **Unwaived Rights**: Any objection to the legality of an arrest must be made before arraignment, otherwise, it is deemed waived.
2. **Eyewitness Identification**: The totality of circumstances test is critical for validating out-of-court identifications.
3. **Conviction Based on Credible Testimony**: Positive and categorical identification by a credible witness outweighs the defense of denial and alibi.

Class Notes:

1. **Elements of Kidnapping for Ransom (Article 267, Revised Penal Code)**
 - A private individual commits the act.
 - Deprivation of another’s liberty.
 - The deprivation is illegal.
 - The deprivation is for ransom.

Statutory Provisions Cited:

- Article 267, Revised Penal Code.
- Republic Act No. 7659.
- Republic Act No. 7438.

- Section 5, Rule 113, Rules of Court (Warrantless Arrest).

Historical Background:

This case arose at a time in the Philippines when there was significant concern about violent crimes such as kidnapping for ransom. The late 1990s and early 2000s saw several high-profile kidnapping cases, leading to stringent law enforcement against such crimes. The amendments under Republic Act No. 7659, which imposed heavier penalties for heinous crimes, including death (later abolished), reflect the legislative attempt to curb such criminal activities. This case underscores the Philippine judiciary's commitment to upholding justice through careful examination of evidence and adherence to procedural rules.