

Title: People of the Philippines v. Roberto “Rambo” Lising, Rodolfo Manalili, Felimon Garcia, Enrico Dizon, and Robin Manga (349 Phil. 530)

Facts:

The case arose from the tragic abduction and murder of Ernesto “Cochise” Bernabe II and Ana Lourdes “Beebom” Castaños, both promising students from the University of the Philippines. On February 25, 1990, Cochise and Beebom were abducted by Enrico Dizon and Robin Manga, who presented themselves as policemen, outside a restaurant in Quezon City. They were forced into Cochise’s Lancer car and taken to San Fernando, Pampanga.

Rodolfo Manalili and Felimon Garcia had conspired with Roberto Lising, a policeman, to abduct Robert Herrera, the suspect in the murder of Manalili’s brother. They mistakenly took Cochise and Beebom instead. The victims were held and subsequently murdered at a warehouse owned by Ligaya Fausto, Lising’s partner. Their bodies were discovered several months later.

The case went through various court proceedings, culminating in a trial court finding the accused guilty. The trial involved testimonies reiterating the sequence of events and details that led to the arrest of the accused and the finding of Cochise and Beebom’s bodies.

Issues:

1. Whether the extrajudicial statements of the accused are admissible and can be used against them.
2. Whether the prosecution witnesses’ testimonies were credible and sufficient to sustain a conviction.
3. Whether there was a conspiracy among the accused to abduct and murder the victims.

Court’s Decision:

1. **Admissibility of Extrajudicial Statements:** The Supreme Court upheld the trial court’s admission of extrajudicial statements, noting the voluntariness of the statements as the accused were assisted by counsel. Interlocking confessions were admissible as they contained consistent and material details that had corroborative value against each other.
2. **Credibility of Witnesses:** The Court ruled that the testimonies of key witnesses, Froilan Olimpia and Raul Morales, were credible. Discrepancies on minor details did not detract from their reliability on the core account of the events. The trial court’s finding on witness credibility was respected, acknowledging the firsthand assessment of testimonial evidence by the trial judge.

3. **Conspiracy:** The Court found a conspiracy established, emphasizing that the accused shared a unity of purpose in abducting and murdering the victims. The actions of the accused, as illustrated through witness testimonies and corroborated by interlocking confessions, demonstrated a concerted effort to execute their criminal plan.

Doctrine:

The Court reiterated that in conspiracy, the act of one is the act of all. Extrajudicial confessions are admissible as corroborative evidence when confirmed by independent evidence or deemed interlocking with confessions from other co-accused.

Class Notes:

- **Conspiracy:** Requires unity of purpose and existence of a common design to commit a felony.
- **Extrajudicial Statements:** Admissible if voluntary, independently executed, and have corroborative or confirmatory value if consistent with other confessions.
- **Credibility of Witnesses:** Trial court's determinations are respected, especially when inconsistency pertains only to minor details not affecting the core of the testimonies.

Historical Background:

The case highlights issues of police involvement in criminal activities during the late 20th century in the Philippines, showing a breach of trust among law enforcers. The events occurred in an era when the Philippine justice system was under scrutiny, emphasizing the need for reforms in law enforcement and prosecution to restore public confidence. The tragic case served as a chilling reminder of the dangers posed by corruption and the misuse of police authority.