

Title: United States vs. Liberato Exaltacion and Buenaventura Tanchinco

Facts:

1. **Initiation of Charges:** On March 26, 1903, the provincial fiscal of Bulacan filed an information against Liberato Exaltacion and Buenaventura Tanchinco for rebellion, alleging that after November 4, 1901, they pledged allegiance and participated in activities aiming to overthrow the U.S. government in the Philippines through affiliation with the Katipunan Society.

2. **Arrest and Evidence Collection:** Both defendants were arrested in March 1903, following the capture of documents at the encampment of a bandit leader, Contreras, in Langca, Meycauayan. These documents, dated July 4 and 17, 1902, bore the signatures of Exaltacion and Tanchinco, indicating their commitment to the Katipunan.

3. **Defendants' Testimony:** The defendants admitted their signatures on the documents but claimed they were forced to sign under duress by the bandits. Tanchinco detailed his capture while he was on his way to work and being compelled to sign a document under threat. Exaltacion similarly recounted being captured, taken to a forest, and coerced into signing.

4. **Witness Corroboration:** Several witnesses, including local officials and civilians, verified the defendants' narratives of their capture and coercion. They also affirmed the defendants' immediate reporting of the incident to local authorities and volunteers upon release.

5. **Procedural Posture:** The initial trial resulted in a conviction based solely on the documents signed under duress. The case was then appealed by the defendants to the Supreme Court.

Issues:

1. **Whether the evidence presented was sufficient to prove the guilt of Exaltacion and Tanchinco for the crime of rebellion beyond a reasonable doubt.**

2. **Whether signing documents under duress as a defense was valid and accepted.**

Court's Decision:

1. **Sufficiency of Evidence:** The Supreme Court found the evidence, namely the coerced documents, insufficient to establish guilt. The Court underscored the consistent and corroborated testimony of the defendants about being forced under duress to sign the documents, emphasizing legal and factual insufficiencies in proving voluntary participation in revolution or rebellion.

2. **Defense of Duress:** The Court validated the defense of duress, considering the immediate subsequent actions of the defendants in presenting themselves to authorities to report the incident, which corroborated their claims of coercion and lack of voluntary involvement in rebellion activities.

Doctrine:

- **Duress as a Valid Defense:** The decision reinforced the principle that actions undertaken under compulsion and threat are devoid of criminal intent and liability, particularly when the individuals promptly report the coercion to authorities.

Class Notes:

1. **Elements of Rebellion (Philippine Legal Context):**

- Intent to overthrow the government by means of force.
- Actual overt act of participation in rebellious activities.
- Voluntary affiliation or support to an organization with rebellious objectives.

2. **Doctrine of Duress:**

- Definition: Compulsion or coercion forcing an individual to act against their will.
- Application: Prove lack of volition due to imminent threat to life or safety.

3. **Criminal Liability and Burden of Proof:**

- Requirement of proof beyond a reasonable doubt in criminal cases.
- Relevance of corroborative evidence in reinforcing defendant testimonies.

Historical Background:

- During the early 1900s, the Philippines was transitioning from Spanish to American control post-Spanish-American War. The Katipunan Society, originally formed against Spanish rule, was seen as a threat by the U.S. government. This period was also characterized by sporadic uprisings and reorganizing revolutionary efforts aiming for Philippine independence, resulting in heightened security measures and prosecutions for

sedition and rebellion under colonial governance.