

**\*\*Title:\*\*** People of the Philippines vs. Koloh Pohong, Ahalin Adjamin, Janala Kulana, and Espital Saratal

**\*\*Facts:\*\***

In the Province of Basilan, specifically in Langisan, District of Lamitan, an unfortunate incident occurred on June 8, 1970. A group consisting of Koloh Pohong, Ahalin Adjamin, Janala Kulana, Espital Saratal, and another person known as Ujaring alias Ujang Asari assembled and armed themselves with weapons such as paltik shotguns and barongs. They allegedly formed a band and committed a robbery with force upon things and violence against persons. The group targeted Elena de Balneg, stealing articles valued at approximately PHP 220. During the robbery, they allegedly hacked and killed Genaro Balneg Sr., Loreto Balneg, their young daughter Elenita, and a one-year-old child, Gerardo Triveles. Additionally, injuries were inflicted upon Benedicto Triveles, aged 6, and Jose Triveles, aged 4.

On July 6, 1970, the four named defendants of Koloh Pohong, Ahalin Adjamin, Janala Kulana, and Espital Saratal appeared for arraignment in the Court of First Instance of Basilan, where they all pleaded guilty. However, Ujaring alias Ujang Asari pleaded not guilty. Upon sentencing on July 11, 1970, the trial court considered mitigating factors such as voluntary surrender and the guilty plea, yet acknowledged several aggravating circumstances including the use of unlicensed firearms, evident premeditation, the involvement of a band, and an utter disregard for the age and sex of the victims, concluding with a sentence of death, along with orders for indemnities and damages.

The case ascended to the Supreme Court on automatic review, where both counsel de officio and the Solicitor General moved to set aside the trial court's decision, arguing the trial court inadequately verified the defendants' comprehension of their guilty plea and its consequences.

**\*\*Issues:\*\***

1. Whether the trial court erred in accepting the guilty pleas of the defendants without ensuring they fully understood the consequences.
2. Whether the trial court's sentencing, based on the guilty pleas alone in a capital offense, was procedurally flawed.

**\*\*Court's Decision:\*\***

The Supreme Court critically assessed the understanding of the guilty plea by the accused. It established that the record did not convincingly show that the accused understood the nature, meaning, and implications of their guilty pleas. The Court underscored the importance of a thorough verification process by the trial court, particularly in capital offenses, to avoid unintended consequences of such pleas.

1. On the first issue, the Court determined that the trial court's process was deficient. It identified inadequacies in the record relating to the arraignment and noted the absence of detailed measures taken by the court to ensure understanding by the defendants. References to the plea proceedings were found insufficiently detailed and failed to demonstrate due diligence by the court in confirming informed consent from the defendants on their guilty pleas.

2. For the second issue, the Supreme Court highlighted that solely relying on the guilty plea to impose a death sentence without supporting evidence or testimony was improper. It emphasized that testimony should be obtained to ascertain not only guilt but also the degree of culpability, thereby affirming the necessity of transparency in judicial review, particularly when the death penalty is involved.

**\*\*Doctrine:\*\***

The case reiterated the judicial principles that in capital offenses, a plea of guilty must be thoroughly examined to ensure full understanding by the accused of its consequences. Furthermore, it necessitates the taking of testimonial evidence even with a guilty plea to establish both the accused's guilt and the appropriate degree of punishment. It also sets a precedent for courts to exercise utmost caution in accepting guilty pleas, especially in cases carrying the death penalty.

**\*\*Class Notes:\*\***

- **\*\*Key Concepts:\*\*** Guilty Plea, Understanding, Capital Offenses, Judicial Review, Mitigating and Aggravating Circumstances
- **\*\*Application:\*\*** The Court requires that a plea of guilty be substantiated by assurance from the trial judge that the accused comprehends its implications. Taking testimonies, even in capital offenses with guilty pleas, shields against unjust convictions, thereby allowing appropriate judicial scrutiny.
- **\*\*Statutory References:\*\*** Section 9, Rule 122, Revised Rules of Court; People vs. Busa; People vs. Apduhan, 24 SCRA 798.

**\*\*Historical Background:\*\***

At the time of the case, the Philippines was under significant legal and political changes post-Marcos era reforms which sought to bolster due process and protect defendants' rights, particularly in capital cases. The decision in this case is reflective of the judiciary's careful navigation of individual rights versus societal imperatives for justice, underscoring the importance of informed pleas and procedural correctness in the adjudication of heinous crimes.