

Title

People of the Philippines vs. Datu Alimpang Mantawar, Bituanin Macalangan, and Mamantar Bationg

Facts

In May 1942, shortly after Japanese forces occupied Barrira, Parang in Cotabato, Sergeants Federico Cuaresma and Antonino Regaspe of the Philippine Army sought assistance from Datu Alimpang Mantawar to guide them to Galigayan where their families had evacuated. Datu Alimpang, along with Mamantar Bationg and Bituanin Macalangan, agreed to assist and led them to Bakar Mato's home to seek a guide for a more direct route. Bakar Mato and his brother Amigos joined the group. Bakar Mato led, followed by Amigos, Datu Alimpang, Sergeant Cuaresma, Bituanin, Sergeant Regaspe, and Mamantar Bationg.

After traveling about a kilometer and crossing the Lipawan River, Bakar Mato heard the word "na" (which means "start" in Moro), causing him to turn around and witness Bituanin attack Sergeant Cuaresma with slashes on the right arm and neck, and Datu Alimpang attacking Sergeant Regaspe similarly. Both sergeants collapsed and died almost instantly. Datu Alimpang then took P800 from Sergeant Cuaresma and P200 from Sergeant Regaspe, distributing the money among his accomplices and taking a rifle and a revolver along with ammunition belonging to the soldiers. Additionally, the accused seized the soldiers' belts, bullets, hats, and shoes. Bakar Mato initially fled but returned when called by Datu Alimpang, witnessing the distribution of the stolen items.

During the trial, testimonies from Bakar Mato, Sergeant Braulio T. Dural, Sergeant Abraham Saliling, and the admissions of the accused (including Datu Alimpang's affidavit) were presented. Bakar Mato, initially one of the five accused in the Juzgado de Paz, was released to testify for the prosecution. Dural and Saliling assisted and interpreted in obtaining Datu Alimpang's confession affidavit, which the accused confirmed as true during his defense.

Issues

1. ****Whether the accused committed the crime of robbery with homicide.****
2. ****Whether the assault on the Sergeants was planned and executed with premeditation and treachery.****
3. ****The validity of the extrajudicial confessions obtained from the accused.****
4. ****The credibility and admissibility of the testimony provided by Bakar Mato, who was initially an accused.****

Court's Decision

1. **Robbery with Homicide**: The court determined that the accused committed the complex crime of robbery with homicide under Article 294, paragraph 1 of the Revised Penal Code. The actions of the accused were concerted, demonstrating premeditation and a shared goal of robbery with the killings executed to facilitate this primary objective.
2. **Premeditation and Treachery**: The court found evidence of treachery as the attack was sudden, leaving the victims defenseless and unaware of any threat. However, treachery does not qualify the crime as murder in the context of the special complex crime of robbery with homicide; it serves as an aggravating circumstance. Premeditation was inherent in the crime, as the attack was orchestrated to ensure the robbery's success.
3. **Extrajudicial Confessions**: The court validated the extrajudicial confessions, noting that Sergeant Dural and Saliling denied any coercion or maltreatment. Datu Alimpang himself confirmed the accuracy of his affidavit, negating claims of involuntariness.
4. **Credibility of Witness Testimonies**: Bakar Mato's testimony was considered credible and corroborated by other evidence. Despite claims of his testimony being unreliable due to his initial status as an accused, the court found no plausible reason to doubt his statements corroborating the series of events that led to the killings and subsequent robbery.

Doctrine

The case reiterates the doctrine that the crime of robbery with homicide is a single, indivisible crime under Article 294, paragraph 1 of the Revised Penal Code. Treachery, while proved, serves as an aggravating circumstance rather than an element transforming the crime to murder, respecting the special nature of the compounded crime.

Class Notes

- **Key Concepts**:
- **Robbery with Homicide (Article 294, Paragraph 1, Revised Penal Code)**:
- The indivisible crime combining robbery and homicide.
- Treachery (alevosia) as an aggravating circumstance.
- **Premeditation**: Deliberation or planning before the commission of the crime.
- **Treachery (Alevosia)**: Ensuring the victim is defenseless.
- **Extrajudicial Confession**: Admissibility based on voluntariness without coercion.

- **Elements Applied**:
- **Superior Court's Jurisprudence on Treachery and Premeditation** (U.S. vs Antonio,

People vs Mataram).

- ****Special Complex Crime Mechanism****: Consolidates multiple offenses into one defined by circumstances of occurrence.

Historical Background

The case occurred during the early months of the Japanese occupation of the Philippines in World War II, reflecting the chaotic environment and the breakdown of conventional law enforcement. This historical context underscores the heightened importance of judicial outcomes to establish rule of law amid widespread turmoil. Misuse or the reliance on firearms, especially among local Moro leaders, highlights the strategic nature of weapon acquisition during the war.