

Title:

People of the Philippines vs. Guiamad Mantung (369 Phil. 1084)

Facts:

On August 10, 1996, at around 8:00 a.m., Mary Ann Gordoncillo, the district manager for Cebuana Lhuiller Pawnshop, received a pager message stating that employee Maribel Mayola of the Maywood, BF Parañaque branch did not return home the previous Saturday, preventing the shop from opening. Renjie Balderas, another employee, was also reported missing. Gordoncillo tried to call the branch but received no response. She then directed a messenger to get duplicate keys from the head office. Meanwhile, Maribel's mother and Renjie's husband awaited outside the shop. Suspicious of the circumstances, Gordoncillo called the police.

Around 9:30 a.m., Ricardo Diago, area manager for Cebuana Lhuiller, was informed by his pager about the branch not being opened. He also proceeded to the branch and was met by police officers and Gordoncillo. The main door had only two locks instead of four, and a foul odor was emanating from the office. At about 11:00 a.m., Myrna Oblanda arrived with the duplicate keys, allowing them to enter the premises through the back door. Inside, the cash drawer was emptied, and a letter left by Guiamad Mantung, the security guard, admitting to the killings and theft was discovered. The dead bodies of Maribel and Renjie were found in the vault room, each with a gunshot wound to the head. Jewelry worth P5,300,000 and cash amounting to P62,000 had been stolen.

Accused-appellant, Guiamad Mantung, was suspected due to his disappearance and was apprehended on August 24, 1996, in Sultan Kudarat, Cotabato, where some stolen jewelry was recovered from his possession. Mantung confessed to the crime during a press conference held by Mayor Joey Marquez, citing religious violation as his motive - the victims forced him to eat pork.

During his trial, Mantung declared three individuals were responsible for the robberies and murders, asserting they captured him and abandoned him at the pier, where he escaped and fled to Sultan Kudarat.

Issues:

1. Whether the evidence presented was sufficient to convict Guiamad Mantung of robbery with homicide.
2. Whether the conviction of Guiamad Mantung was valid despite objections raised about

the admissibility of his extrajudicial statements.

3. Whether the ruling of the death penalty by the lower court was appropriate given the circumstances of the case.

4. Whether the generic aggravating circumstances of evident premeditation and treachery were correctly applied by the trial court in qualifying the offense.

Court's Decision:

The Supreme Court affirmed Guiamad Mantung's conviction for robbery with homicide but modified the penalty from death to reclusion perpetua due to insufficiency of proof regarding the aggravating circumstances of evident premeditation and treachery.

1. **Sufficiency of Evidence**:

The Court found the prosecution had established beyond reasonable doubt that Mantung committed the crime. The evidence included the accused's presence at the crime scene, failure to report the incident, flight after the crime, recovery of stolen items in his possession, and his confession during the press conference.

2. **Admissibility of Extrajudicial Confessions**:

The Court ruled Mantung's statements at the press conference were admissible since they were made voluntarily in response to Mayor Marquez's inquiry. It discounted objections that the statements were made without the assistance of counsel, finding no coercion or duress involved.

3. **Death to Reclusion Perpetua**:

The Court modified the penalty to reclusion perpetua because the evidence did not support the presence of evident premeditation and treachery, which were necessary to sustain the death penalty.

4. **Aggravating Circumstances**:

The trial court's application of evident premeditation and treachery was deemed erroneous. The prosecution failed to provide clear evidence of premeditation and the exact manner of committing the killings to establish treachery.

Doctrine:

In convicting someone for robbery with homicide, the prosecution must establish beyond reasonable doubt all elements: the unlawful taking of property committed with violence or intimidation and the killing of any person by reason or on occasion thereof. A voluntary confession not made under custodial investigation and spontaneous admissions to public

officials may be admissible without the need for counsel.

Class Notes:

1. **Key Elements of Robbery with Homicide**:

- Unlawful taking of personal property belonging to another through violence or intimidation.
- Homicide committed by reason or on the occasion of the robbery.

2. **Admissibility of Evidence**:

- Voluntary extrajudicial confessions made not during custodial investigation but to public officials are admissible (People vs. Andan).
- Non-objection to the admissibility of evidence during the trial results in waiver of the objection.

3. **Reclusion Perpetua vs. Death Penalty**:

- Absence of aggravating circumstances such as evident premeditation or treachery requires penalties to be reduced from death to reclusion perpetua (People vs. Montiero).

Historical Background:

The case unfolds in the broader context of the Philippines' ongoing struggles with violent crimes involving robbery and homicide during the mid-1990s, against the backdrop of legal reforms such as RA 7659, which re-imposed the death penalty for heinous crimes. This case also reflects the legal culture and procedural nuances in the Philippine judicial system, especially in handling criminal confessions and the application of aggravating circumstances.