

****Title: People of the Philippines v. Wilfredo Lara (G.R. No. 79909)****

****Facts:****

On December 8, 1987, around 3:00 AM, in Estrellita Guzman's residence at 22 Sta. Teresita Street, Barrio Capitolyo, Pasig, Metro Manila, Arlene Tuyor, a domestic helper, was awakened by loud knocking. Upon opening the door, she saw Ferdinand Suarez ("Jojo") with two masked men. The men tied her up and, failing to get any money from her, left taking Suarez with them. Estrellita Guzman's nieces, Maria Prescilla Guzman ("Babyruth"), Maria Cristina Guzman ("Cristy"), Maria Victoria Suarez ("Marivic"), and Marivic's husband Ferdinand Suarez, along with their children, were residing in the same house.

After hearing noises, Tuyor discovered Estrellita severely wounded in her bedroom and bleeding profusely. She later died from stab wounds, while Suarez, Marivic's husband, was later found tied up and allegedly assaulted by the intruders.

Police investigations led nowhere initially, so the National Bureau of Investigation (NBI) became involved. Atty. Salvador Ranin at the NBI suspected Suarez due to lack of visible injuries and strained relations with Estrellita. Suarez eventually confessed, detailing his involvement and implicating accomplices like Loreto Reyes and others in the robbery and murder.

Suarez's confession revealed that he initially agreed to a robbery arranged by Reyes after threats to his life. He assisted Reyes' gang by unlocking doors to facilitate their entry. On the night of the crime, Reyes and other accomplices entered the house, tying up the inhabitants and ransacking the rooms. Reyes' accomplices included Wilfredo Lara, who allegedly found and introduced the gang to Suarez.

The NBI gathered supporting confessions and witnesses to the crime. Subsequent trials led to Suarez, Reyes, and Lara's convictions for robbery with homicide. While Suarez and Reyes accepted the verdict, Lara appealed, contesting the admissibility of extrajudicial confessions and alleging they were obtained under duress and without effective legal counsel.

****Issues:****

1. Whether the extrajudicial confessions of Wilfredo Lara were admissible.
2. Whether there was sufficient evidence to hold Lara criminally liable as a principal in the crime.

3. Whether the lower court erred in finding Lara guilty beyond a reasonable doubt.

Court's Decision:

1. **Admissibility of Extrajudicial Confessions:**

The Supreme Court upheld that the extrajudicial confessions of Lara and his co-accused Reyes were given voluntarily, dismissing claims of duress or intimidation. Witnesses present during the confession process testified to their voluntariness and adherence to constitutional guarantees, including the presence of a lawyer during the investigation.

2. **Sufficient Evidence of Criminal Liability:**

While recognizing the lack of direct participation in the planning or execution of the crime by Lara, the court considered his role in introducing Suarez to the gang as significant. However, relying on principles of strict interpretation of criminal participation, Lara was deemed an accomplice rather than a principal.

3. **Guilt Beyond Reasonable Doubt:**

Despite finding credibility in Lara's claims of coercion, the Court identified his involvement as an accomplice. Therefore, they modified his liability, sentencing him as an accomplice rather than a principal in the crime of robbery with homicide.

Doctrine:

1. **Interlocking Confessions and Hearsay Rule:**

Interlocking confessions can be exceptions to the hearsay rule, permissible as corroborative evidence against co-accused in establishing criminal facts and conspiracies.

2. **Voluntariness in Confessions:**

Confessions are presumed voluntary if given with full constitutional safeguards. The burden of proving coercion or involuntariness lies on the accused.

3. **Participation of an Accomplice:**

An accused considered to have a lesser role—introducing criminals or showing knowledge without direct participation in the crime—may be treated as an accomplice rather than a principal.

Class Notes:

- **Robbery with Homicide** (Art. 294, Revised Penal Code)

- The penalty is higher due to the combination of robbery with the element of homicide.
- Establishing principal liability requires active participation or indispensable cooperation.
- **Extrajudicial Confessions:**
- Must be given voluntarily with constitutional rights observed.
- Can corroborate other evidence if consistent and credible.

Historical Background:

The case reflects late 1980s Philippine criminal jurisprudence focused on violent crimes involving substantial investigation complexities. It underscores the judiciary's evolving stance on issues like extrajudicial confessions and establishing participation degrees in crimes, providing a vital precedent for future cases involving robbery with homicide.