

Title:

People of the Philippines vs. Santiago Peralta y Polidario, Armando Datuin Jr. y Granados, Ulysses Garcia y Tupas, Miguelito de Leon y Luciano, Librando Flores y Cruz, and Antonio Loyola y Salisi

Facts:

In 1992, the Central Bank of the Philippines (now the Bangko Sentral ng Pilipinas) discovered that punctured currency notes meant for shredding, with a face value totalling PHP 194,190.00, had been stolen. The theft was traced back to personnel responsible for handling the notes, particularly Ulysses Garcia y Tupas, Miguelito de Leon y Luciano, Librando Flores y Cruz, Antonio Loyola y Salisi, and others. Complaints were filed by Pedro Labita, leading to the arrest of Garcia and co-accused. Garcia was arrested without a warrant and during police custody, he gave three separate sworn statements admitting his and others' involvement in the crime. His statements became the basis for apprehending the other accused.

Procedural Posture:

1. **November 4-9, 1992**: Arrests were made; Garcia's extrajudicial confessions obtained.
2. **May 4, 1993**: Arraignment where all accused pleaded not guilty.
3. **September 30, 1998**: Trial Court declared Datuin Jr. and Peralta at large.
4. **August 21, 2000**: RTC of Manila convicted all accused of qualified theft.
5. **Appeal by Garcia and co-accused**: Challenged RTC decision on grounds including violation of constitutional rights during custodial investigation.

Issues:

1. **Admissibility of Garcia's Extrajudicial Confessions**:
 - Were Garcia's confessions obtained in violation of his constitutional rights due to the absence of counsel during custodial interrogation?
2. **Admissibility of the Perforated Currency Notes**:
 - Were the currency notes found in Garcia's possession, taken following an unlawful arrest, admissible?
3. **Sufficiency of Evidence**:
 - Was there sufficient admissible evidence to convict the accused of qualified theft?

Court's Decision:

1. Admissibility of Extrajudicial Confessions:

Issue: Garcia claimed confessions were extracted without proper legal counsel, violating

his constitutional rights under the 1987 Constitution, Article III, Sections 12(1) and (2).

****Ruling****: The Court determined that Garcia was not assisted by an independent counsel during his custodial investigation. His confessions, obtained in the absence of competent counsel, violated his constitutional rights. Therefore, these confessions were inadmissible in evidence.

2. Admissibility of Perforated Currency Notes:

****Issue****: Garcia challenged admissibility by arguing that they were obtained from an unlawful arrest and search.

****Ruling****: The Court found the arrest illegal as it was conducted without a warrant and outside the permissible conditions for warrantless arrests. Consequently, the search and seizure of the perforated notes were also unlawful, rendering the evidence inadmissible.

3. Sufficiency of Evidence:

****Issue****: Whether the remaining evidence, excluding inadmissible confessions and notes, was sufficient for conviction.

****Ruling****: The Court concluded that with the exclusion of Garcia's extrajudicial confessions and the three-piece P100 perforated currency notes, the prosecution did not present sufficient admissible evidence to sustain the conviction. Other evidence, such as unexplained affluence, lacked substantiation. Hence, the trial court's decision was reversed, and the accused were acquitted.

Doctrine:

- **Constitutional Right to Counsel****: Any confession obtained during custodial investigation without the presence and assistance of competent and independent counsel is inadmissible (Article III, Section 12 of the 1987 Constitution).
- **Exclusionary Rule****: Evidence obtained from an unlawful search incident to an unlawful arrest is inadmissible in court.

Class Notes:

- ****Key Elements for Qualified Theft****:
- Intent to gain unlawfully
- Without consent of the owner
- Abuse of confidence if applicable (employees with free access to property)
- ****1987 Philippine Constitution, Article III, Section 12****:

- Right to counsel during custodial investigation
- Prohibition of torture, violence, secret detention
- Inadmissibility of confessions obtained in violation

Historical Background:

In the early 1990s, the Bangko Sentral ng Pilipinas underwent a series of internal reforms and audits, including overhauling its currency management systems. The case reflects the increased attention on internal corruption and procedural adherence, emphasizing the importance of constitutional rights during custodial interrogations and judicial scrutiny of law enforcement methods. This context underscores the continued efforts in the Philippines to uphold due process and the rights of the accused during periods of systemic change.