

Title:

****People of the Philippines vs. Rodrigo Villaruel, Wilson Aplomenina, Fernando Fuentes, and Polobrico Caballero****

Facts:

On the night of July 4, 1989, six armed men forcibly entered the Cacho family's house in Sitio Manlud, Barangay Sto. Rosario, Ajuy, Iloilo. The intruders hogtied Ponciano Cacho, ransacked their home, stole personal belongings, and cash. His daughter, Lyneth, aged thirteen, was raped by four of the armed men. The assailants were later identified as Rodrigo Villaruel, Wilson Aplomenina, Fernando Fuentes, and Polobrico Caballero.

Lyneth was taken to various health facilities for examination but was only properly examined by Dr. Jeremiah Obañana on July 7, 1989, who found a healed hymenal laceration at the 8:00 o'clock position. Ponciano reported the crime to the Philippine Constabulary, leading to a chase and eventual apprehension of Villaruel and Aplomenina in Cadiz City. Caballero was arrested later, while Dequeña and Basa managed to evade arrest.

On August 27, 1989, the four identified accused-appellants were apprehended. They were charged with Robbery with Rape. Upon trial, all pleaded "Not Guilty." The prosecution's narrative indicated crucial identification of the accused by the victims despite claims of insufficient lighting and masks. The defense presented alibis and denial, asserting they were engaged in legitimate livelihoods and not near the scene.

Issues:

1. Whether the extrajudicial confession by Polobrico Caballero was admitted inadmissibly as evidence.
2. Whether the identification of the accused by the prosecution witnesses was credible.
3. Whether the accused are guilty of Robbery with Rape beyond a reasonable doubt.

Court's Decision:

The Supreme Court addressed each issue as follows:

1. ****Extrajudicial Confession:****

The trial court did not rely on Caballero's extrajudicial confession, deeming it moot. Extrajudicial confessions elicited without counsel are inadmissible, but the conviction was based on testimonies of the prosecution witnesses.

2. ****Credibility of Identifications:****

The Supreme Court found the prosecution's identification credible. It ruled that the combination of household lighting and face-to-face interactions provided adequate visibility for identification. While only one malefactor wore a mask, the mask fell off during the assault, allowing victims to recognize Caballero.

3. **Guilt Beyond Reasonable Doubt:**

The Supreme Court upheld the conviction for robbery against Villaruel and Fuentes but reversed the conviction for the rape charge due to insufficient identification. Caballero and Aplomenina were convicted for both robbery and rape. The court considered Aplomenina's age and modified his sentence due to his minority.

Doctrines:

1. An extrajudicial confession obtained without counsel is inadmissible.
2. Adequate lighting conditions for witness identification included moonlight, kerosene lamps, and even flashlights, depending on circumstances.
3. The presence and participation of an accused in a crime must be established beyond reasonable doubt; mere proximity or association is insufficient.

Class Notes:

- **Elements of Robbery with Rape:**
 - Intent to gain
 - Force/intimidation
 - Theft of personal property
 - Accompanied by rape
- **Identification:**
 - Sufficiency of illumination (even minimal)
 - Witness credibility
 - Direct confrontation
- **Alibi as Defense:**
 - Alibi defense requires proof that the accused was at another place, making it physically impossible to be at the crime scene.
- **Art. 68(2), Revised Penal Code:**
 - Mitigating circumstance of minority reduces the penalty by one degree when the offender is under 18 years old at the time of the crime.

Historical Background:

This case reflects the judicial procedures and evidentiary standards during late 20th-century Philippines. It provides insight into how the courts balance public accusations, the accused's rights, and the principles of fair trial and justice. Addressing social issues such as rape, robbery, and ill-treatment during investigations reveals the period's legal and societal challenges, reflecting the evolving legal landscape and human rights awareness.