

****Title:****

People of the Philippine Islands vs. Marciano Medina

****Facts:****

On August 7, 1932, Marciano Medina, also known as Mariano Medina and Alejandro Dola, committed multiple crimes in the municipality of Parañaque, Province of Rizal. Medina broke into the house of Capt. J. H. Davidson by forcing his way through a wire-protected window. Once inside, he was detected by the occupants, which led to an altercation. In an attempt to escape, Medina attacked Joseph Davidson with a knife, inflicting a mortal wound to his chest that penetrated the lung. Medical assistance from Dr. Alexander Mileau prevented Joseph's death. Medina also assaulted Capt. Davidson, Mrs. Davidson, and their daughter Mary, causing various injuries that required medical attention for more than ten but less than thirty days. Medina was charged with trespass to dwelling with frustrated homicide and physical injuries.

Medina, represented by an appointed defense lawyer, pleaded guilty to the charges during the trial at the Court of First Instance of Rizal. The court, considering Medina's guilty plea and the presence of multiple aggravating circumstances—committing the crime at night, disregard of the victims' sex, unlawful entry, breaking the window, and previous convictions—sentenced him to prison terms for each crime without objection from Medina's counsel. Medina was sentenced to various terms for each of the crimes: four years, nine months, and eleven days for trespass to dwelling; ten years and one day for frustrated homicide; and four months and one day for less serious physical injuries.

****Issues:****

1. Whether convicting Medina of multiple crimes based on a single information was lawful.
2. The propriety of imposing multiple penalties instead of a single penalty for the gravest offense under the Revised Penal Code.

****Court's Decision:****

The Supreme Court upheld the lower court's decision to convict Medina of multiple crimes.

1. ****Multiplicity of Charges:****

- Medina's lawyer did not demur to the information, which charged multiple offenses. Rule established in *People vs. Miana*, stating that a failure to object to multifariousness means the defendant waived the objection and can be convicted of all offenses charged and proven.
- The plea of guilty was valid under *United States vs. Jamad*, as Medina admitted his guilt

knowingly and voluntarily, sufficient to sustain conviction without further evidence.

2. **Imposition of Multiple Penalties:**

- The revised Penal Code, Article 70, permits the imposition of multiple penalties to be served successively or concurrently, disproving the defense counsel's argument relying on Article 48. Article 48 pertains to complex crimes, not applicable here as multiple distinct offenses were committed.

The Supreme Court confirmed the presence of aggravating circumstances but clarified that the unlawful entry and broken window could not be considered as such in relation to the crime of trespass to dwelling. However, other aggravating circumstances justified the penalties' severity.

Doctrine:

1. A plea of guilty admits guilt and suffices for conviction without further evidence if made freely and voluntarily (United States vs. Jamad).
2. An information charging multiple offenses without objection results in waiver; the defendant may be convicted of and sentenced for all charged offenses (People vs. Miana).
3. Article 70 of the Revised Penal Code allows for multiple penalties to be served simultaneously or consecutively, as opposed to using Article 48 for complex crimes.

Class Notes:

- **Elements of Valid Guilty Plea:**

- * Must be made freely and voluntarily
- * The accused must fully understand the consequences
- * Sufficient to sustain a conviction

- **Complex vs. Multiple Offenses:**

- * Complex crimes (Article 48) involve a single act constituting multiple offenses or one being necessary for the commission of another.
- * Multiple offenses (Article 70) permit the imposition of separate penalties for distinct crimes committed.

- **Aggravating Circumstances:**

- * Nighttime for opportunity and success
- * Disregard of gender
- * Presence of prior convictions

****Historical Background:****

The case occurred during the American colonial period in the Philippines when legal reforms, including the introduction of the Revised Penal Code, were being established. The interpretation and application of these new laws were crucial in transitional jurisprudence, impacting the fairness and comprehensiveness of judicial proceedings. This context highlights the evolving legal framework and the judiciary's role in adapting to and implementing changes in statutory provisions.