

Title:

People of the Philippines vs. Josefina A. Esparas and Rodrigo O. Libed, G.R. No. 329 Phil. 339 (1996)

Facts:

Josefina A. Esparas was charged with violating Republic Act No. 6425, amended by Republic Act No. 7659, for importing twenty (20) kilograms of methamphetamine hydrochloride, commonly known as “shabu”, in Criminal Case No. 94-5897 before the Regional Trial Court (RTC) of Pasay City, Branch 114.

1. **Arrest and Escape:** After her arraignment, Esparas escaped from jail. Despite her absence, the trial proceeded in her absence.
2. **Conviction:** On March 13, 1995, the trial court found Esparas guilty as charged and imposed the death penalty.
3. **Automatic Review:** Given that Esparas had not been apprehended, her case was automatically transmitted to the Supreme Court for review, as mandated by Philippine legal procedure.

Issues:

1. **Mandatory Nature of Automatic Review:** Should the Supreme Court proceed with the automatic review of a death sentence if the convicted individual has escaped custody and remains at large?
2. **Jurisdiction and Appeal:** Does the escape of an accused deprive the court of jurisdiction to conduct an automatic review of the death penalty?

Court’s Decision:

1. **Automatic Review Upheld:** The Supreme Court held that the escape of a convict sentenced to death does not relieve the Court from its mandatory duty to review the conviction. The Court relied on long-established jurisprudence which mandates the automatic review of all death penalty cases to ensure that the merits and legality of the sentence are meticulously examined.
2. **Historical Precedents:** Citing cases such as *U.S. vs. Laguna*, *People vs. Villanueva*, and *People vs. Cornelio*, the Court reaffirmed its role in providing a comprehensive review in all instances involving the death penalty.
3. **Public Policy Consideration:** The decision was firmly rooted in the policy that the final determination of guilt in capital punishment cases is too critical to be waived by action or

inaction of the accused. The review process acts as an additional safeguard to check the trial court's judgment for errors, thus protecting the accused's right to due process.

4. **Directive Issued:** The Court granted a fresh period of thirty (30) days to the counsel of Esparas to file her appellant's brief.

Doctrine:

The Supreme Court reaffirmed the doctrine that the mandatory review of death penalty cases cannot be waived or evaded, regardless of the convict's status, even if the convict absconds or otherwise does not submit to the jurisdiction of the court. The judgment of conviction in death penalty cases is not final until reviewed by the Supreme Court.

Class Notes:

- **Automatic Review (Sec. 10, Rule 122 of Rules of Court):** In all cases where the death penalty is imposed, the record shall be automatically forwarded to the Supreme Court. This rule ensures thorough re-examination of the case.
- **Doctrine from U.S. vs. Laguna:** The Supreme Court has a non-waivable duty to review death penalty cases to ensure no error in judgment.
- **Jurisdiction over the Person:** An escape does not negate the Supreme Court's jurisdiction or its duty to review death sentences en consulta.
- **Statutory and Constitutional Provisions:**
- **Sec. 10, Rule 122 of the Rules of Court**
- **Article III, Sec. 19(1) of the 1987 Constitution**

Historical Background:

The case's context is heavily influenced by the Philippine judiciary's historical commitment to ensuring due process in death penalty cases. This commitment dates back to the early 20th century jurisprudence under U.S. sovereignty, such as the 1910 case of U.S. vs. Laguna. The laws and procedural rules have evolved, but the principle of mandatory review for death penalties has remained constant. The modern context includes the reimposition of the death penalty in the 1990s due to rising heinous crimes, reflecting both societal demands for stringent punishment and an uncompromising protection of legal due process by the judiciary.

The case illustrates the delicate balance between strict law enforcement procedures against heinous crimes and meticulous judicial review to protect constitutional rights. Thus, the historical trajectory underscores the resilience of due process in capital punishment cases

as an integral part of the Philippine justice system.