

Title: Ferdinand “Vhong” H. Navarro vs. Deniece Milinette Cornejo, et al.

Facts:

This case revolves around Ferdinand “Vhong” H. Navarro, a celebrity, who was accused of Rape and Attempted Rape by Deniece Milinette Cornejo. Cornejo filed several complaints alleging that two separate incidents occurred on January 17, 2014, and January 22, 2014, at her condominium unit where Navarro forced himself upon her.

The Department of Justice (DOJ) initially dismissed Cornejo’s complaints for lack of probable cause. However, upon subsequent review, the Court of Appeals (CA) reversed the DOJ’s resolutions and directed the Office of the City Prosecutor of Taguig City to file Informations against Navarro for Rape by Sexual Intercourse under Article 266-A (1) of the Revised Penal Code (RPC), as amended, and for Acts of Lasciviousness under Article 336 of the RPC.

Navarro contested the CA’s decision, claiming that the CA erred in its findings. He raised the matter to the Supreme Court, seeking relief and the restoration of the DOJ’s decision dismissing the complaints against him.

Issues:

1. Whether the Court of Appeals erred in finding that the DOJ committed grave abuse of discretion in sustaining the prosecutor’s finding of lack of probable cause against Navarro.
2. Whether the Supreme Court should overturn the CA’s decision and dismiss the charges against Navarro.

Court’s Decision:

The Supreme Court decided in favor of Navarro, finding that the CA erred in ruling against the DOJ’s decision. The SC highlighted that the prosecutor had conducted a thorough examination of the facts and discrepancies within Cornejo’s complaints, which exhibited severe inconsistencies and improbabilities that cast doubt on her credibility and the veracity of her allegations. The SC held that the discrepancies between her affidavits were too significant to ignore, and it was not necessary to assess witness credibility to discern such inconsistencies. Therefore, the SC found that the DOJ did not commit grave abuse of discretion, and the charges against Navarro were dismissed for lack of probable cause.

Doctrine:

The Supreme Court reiterated the principle that the determination of probable cause during a preliminary investigation is primarily the function of the prosecutor. The credibility of the complainant’s allegations, when they exhibit clear contradictions, sufficiency of evidence,

and legal impossibilities, can be subject to scrutiny by the prosecutor. Furthermore, courts should not interfere with the prosecutor's authority unless there is a showing of grave abuse of discretion.

Historical Background:

The historical context of the case is tied to the legal standpoint that prosecutorial discretion in determining probable cause is given wide berth and protected from undue interference, especially in highly sensationalized cases implicating public figures, where public opinion may cloud the unprejudiced administration of justice.

Class Notes:

Article 266-A of the RPC, as amended by RA 8353, defines the crime of rape and sets forth circumstances under which sexual assault can be prosecuted. Article 336 of the RPC pertains to the crime of Acts of Lasciviousness. Furthermore, the elements of rape and attempted rape must be clearly established for the prosecutor to decide to file the necessary information against an accused. In the adjudication of preliminary investigations, the role of the prosecutor is to ensure that probable cause exists before exposing individuals to criminal trial and possible punishment. This case expounds on the delicate balance that must be struck between protecting the rights of the accused from unwarranted prosecution and ensuring that justice is served for legitimate complaints.