

Title: People of the Philippines v. Noel Navasero, Sr. y Hugo

Facts: In fifteen separate Informations, defendant-appellant Noel Navasero, Sr. was accused of committing fifteen counts of qualified rape against his biological daughter, identified only as AAA to protect her privacy, from 2010 to 2013 while she was a minor. The first ten incidents happened in their house in an undisclosed location, and the remaining five occurred in their new residence post-relocation. AAA testified the abuses happened when other family members were either absent or asleep, and that each incident ended with threats to her life and to her family's safety if she disclosed the abuse. The mother assisted AAA in reporting the crimes to authorities, catalyzing the legal actions against Navasero.

Procedural Posture: Navasero pleaded not guilty during arraignment and the case proceeded to trial. AAA testified as the sole witness for the prosecution, while the defense hinged on Navasero's denial, arguing that the accusations were fabrications due to his disciplinarian approach to parenting. The Regional Trial Court convicted Navasero of all counts, and the Court of Appeals affirmed the decision with modifications to the monetary damages awarded. The Supreme Court dismissed the appeal, affirming the lower courts' decisions, finding Navasero guilty of all counts.

Issues:

1. Whether AAA's testimony was credible given the identical nature of the narrations of each rape incident.
2. Whether the delayed reporting of the incidents by AAA affects the veracity of her claims.
3. The appropriate penalty and damages for the crime of qualified rape in light of Republic Act No. 9346, which prohibits death penalty.

Court's Decision: The Supreme Court upheld the Court of Appeals' and Regional Trial Court's decisions, finding them without error, affirmed Navasero's conviction for fifteen counts of qualified rape, and modification of the damages awarded. It reasoned that the child's consistent and detailed account, despite the number of incidents, reflected the traumatic experience credibly. The Court also recognized that there's no standard response to sexual molestation, and that the delay in reporting abuse, especially incestuous, does not undermine the veracity of AAA's claims.

Doctrine: The Court reaffirmed the doctrine that in rape cases, the credibility of the victim's testimony is of paramount importance and can be the sole basis for a conviction if it is credible, convincing and in line with human experience. It also emphasized that the absence

of free consent in rape is conclusively presumed when the victim is below twelve years old or when there is a parent-child relationship under Republic Act No. 9346.

Class Notes:

1. Credibility of the victim's testimony in rape cases is crucial and can be the sole basis for conviction.
2. Delay in reporting sexual abuse, particularly in cases of incest, does not automatically render the testimony of the victim incredible.
3. Republic Act No. 9346 prohibits the imposition of the death penalty and prescribes the penalty of reclusion perpetua without eligibility for parole in qualified rape cases with aggravating circumstances such as the victim's minority and her relationship to the offender.

Historical Background: This Supreme Court case illustrates the societal challenge to protect minors from sexual violence and bring perpetrators to justice, even in cases where the perpetrator is a parent, emphasizing the heinous nature of such crimes and a legal system's role in upholding justice for vulnerable individuals. It also reflects the evolution of the Philippines' legal stance on capital punishment, where Republic Act No. 9346 abolishes the death penalty and replaces it with life imprisonment without parole for heinous crimes.