

Title: People of the Philippines vs. Arnulfo Orande y Chavez

Facts:

Between January 1994 and November 1996, AAA, a minor, accused Arnulfo Orande y Chavez of raping her four times in their home. The incidents allegedly occurred while AAA's mother, Girlie de la Cruz Castro (Orande's common-law wife), was away buying fish for her market stall. In each incident, Orande purportedly utilized threats, intimidation, or weapons to facilitate the assault. Following AAA's confession to a teacher at her school, criminal cases were filed, and Orande was charged with two counts of simple rape, one count of statutory rape, and one count of frustrated rape.

The trial faced an eight-month postponement to allow AAA to receive psychological treatment. The proceedings resumed in November 1998, with AAA testifying about the traumatic experiences. After a full trial and presentation of evidence from both sides, including witnesses and expert testimony from Dr. Bernadette J. Madrid, the trial court believed AAA's narrative and convicted Orande of all charges.

Issues:

1. Whether the accused, Arnulfo Orande y Chavez, was guilty beyond reasonable doubt of one count of statutory rape, one count of frustrated rape, and two counts of simple rape.
2. Whether frustrated rape exists as a crime under Philippine law.

Court's Decision:

The Supreme Court upheld appellant's conviction for two counts of statutory rape and two counts of simple rape, while nullifying the conviction for frustrated rape since it is not within the scope of Philippine penal law. The Court found that:

- AAA's testimony was credible and consistent with that of a true victim of sexual abuse.
- Denial and alibi could not prevail over the positive identification and categorical testimony of the rape victim.
- The inconsistencies in AAA's testimony were minor and understandable given the traumatic nature of the events she was recounting.
- The conviction for 'frustrated rape' was erroneous because Philippine jurisprudence has consistently held that no such crime exists. Instead, all the elements constituting the consummated stage of rape were present, thereby the act was deemed consummated, not frustrated.

Doctrine:

The Court reiterated the doctrine that there is no crime of frustrated rape under Philippine law and that any penis penetration, however slight, is sufficient to warrant a conviction for consummated rape.

Class Notes:

- Rape under Philippine law does not require full penetration; slight penetration is sufficient.
- Credibility of a rape victim's testimony is generally given weight when it is consistent and believable.
- Delay in reporting sexual assault does not necessarily affect the credibility of the witness if satisfactorily explained.
- A common-law spouse who commits statutory rape upon a minor under their care could be charged under Article 335 of the Revised Penal Code.

Historical Background:

The case encapsulates the delicate issues surrounding prosecution of sexual crimes in the Philippines, demonstrating the struggles that come with the reporting, trial, and treatment of rape survivors, particularly minors, as well as the evolution of legal understanding of consummation in rape cases. It underscores the relevance of a judicial system that recognizes the challenges faced by survivors and emphasizes legal interpretations that best serve justice.