

Title:

****People of the Philippines v. Antonio Lauga y Pina Alias Terio****

Facts:

This case pertains to Antonio Lauga's conviction for the rape of his thirteen-year-old daughter, identified as AAA to protect her identity, as mandated by the Supreme Court in *People v. Cabalquinto*. The Information, dated 21 September 2000, charged Lauga with qualified rape occurring on the evening of 15 March 2000 in Bukidnon, Philippines. Lauga pleaded not guilty, and during the pre-trial conference, the parties stipulated certain facts regarding AAA's age, her relationship to Lauga, and the findings of the medical examination following the incident.

Witnesses for the prosecution included victim AAA; her brother, identified as BBB; and a 'bantay bayan' member, Moises Boy Banting. Their testimonies outlined the sequence of events on the night of the rape, the resulting physical examination findings affirming the rape, and Lauga's confession to Banting without legal representation.

Lauga's defense hinged on claims of ill motive by AAA due to his disciplinary measures as a father. Despite an admission of physically assaulting AAA, Lauga denied the rape allegations, describing his whereabouts and actions on the incident date.

Upon Lauga's conviction by the Regional Trial Court, the Court of Appeals and the Supreme Court upheld the conviction, modifying damages awarded to AAA and affirming Lauga's ineligibility for parole based on the severity and nature of the crime committed.

Issues:

1. The admissibility of Lauga's extrajudicial confession to a 'bantay bayan' in the absence of legal representation.
2. The credibility of the victim's and other witnesses' testimonies, considering claimed inconsistencies.
3. The application of the Anti-Rape Law of 1997 to the case, specifically evaluating the elements of use of force in a father-daughter relationship.

Court's Decision:

The Supreme Court ruled that:

1. ****Admissibility of the extrajudicial confession****: Lauga's confession was deemed inadmissible due to the absence of legal counsel. However, the conviction was not solely based on this confession but on the totality of evidence proving guilt beyond reasonable

doubt.

2. **Credibility of witnesses**: Minor inconsistencies in witness testimonies were considered inconsequential, not undermining their overall credibility. The testimony of a minor, alleging rape by a parent, was considered with the gravity due to its implications and inherent believability, undeterred by assertions of ill motive.

3. **Application of the Anti-Rape Law**: The Court upheld the conviction under the Anti-Rape Law of 1997, affirming the presence of qualifying circumstances (minority and the parental relationship) that warranted reclusion perpetua without the possibility of parole.

Doctrine:

The decision underscored the inadmissibility of extrajudicial confessions obtained without counsel, emphasized the compensatory damages due to rape victims when aggravating circumstances are present, and reiterated the serious nature of rape, especially when committed by a parent against a minor child.

Class Notes:

- **Key Elements of Qualified Rape**: The case illustrates the aggravating circumstances that elevate rape to qualified rape, including the victim's minority status and the paternal relationship between the victim and perpetrator.
- **Admissibility of Confessions**: Article III, Section 12(1) and (3) of the Philippine Constitution requires that a person under investigation must be informed of their rights, including representation by counsel. A confession without such representation is inadmissible.
- **Credibility of Witness Testimony**: Testimonies by minors alleging rape by a parent are deemed highly credible, addressing potential motives of accusation as insufficient to discredit such allegations.

Historical Background:

This case illustrates the application of the Anti-Rape Law of 1997 in the Philippines, specifically addressing the aggravated circumstances of a father committing rape against his minor daughter. It highlights the judiciary's role in protecting minors from sexual abuse, particularly within familial relationships, and the legal stipulations guiding the admissibility of confessions and witness credibility.