

Title:

People of the Philippines and AAA vs. Court of Appeals, Raymund Carampatana, Joefhel Oporto, and Moises Alquizola

Facts:

On March 25, 2004, AAA attended her high school graduation ceremony. That night, she and friends, including the accused, went to Alson's Palace, Maranding, Lala, Lanao del Norte, for a celebration. The group engaged in a drinking session, during which AAA became heavily intoxicated. She was later transported to Alquizola Lodging House, where Carampatana and Oporto allegedly raped her, and Alquizola molested her. A medical examination confirmed sexual assault. The accused, however, contended that the sexual activity was consensual and brought witnesses to support their claim. The RTC convicted Carampatana and Oporto for rape, and Alquizola as an accomplice, but acquitted others involved. The CA reversed this decision, acquitting the accused due to lack of evidence proving guilt beyond a reasonable doubt.

Issues:

1. Did the CA commit grave abuse of discretion in acquitting the accused based on the premise of consensual sex despite AAA's testimony?
2. Is the sole testimony of the victim credible and sufficient to prove rape beyond reasonable doubt?
3. Was there a conspiracy among the accused in the commission of rape?
4. Are the accused liable for multiple counts of rape?
5. What are the appropriate penalties and civil liabilities for the convicted?

Court's Decision:

The Supreme Court reversed the CA's acquittal, finding the accused guilty of four counts of rape. It was highlighted that the CA relied solely on the defense's evidence, disregarding AAA's testimony and the RTC's findings. The SC emphasized that the victim's state of intoxication rendered her incapable of consent, and her immediate report of the incident negates the presumption of consensual sex. It further established the presence of a conspiracy among the accused based on their coordinated actions. The SC sentenced Carampatana and Alquizola to reclusion perpetua for each count of rape, and Oporto, being a minor at the time, received a lower sentence but with consideration for his minority status. The accused were also ordered to pay damages to AAA.

Doctrine:

The case reiterates the doctrine that rape can be committed by a man against a woman even without her overt physical resistance when she is deprived of reason or otherwise unconscious. Furthermore, the sole testimony of the victim, if credible, can be sufficient to establish that rape was committed.

Class Notes:

- **Rape through Intoxication:** Victims who are intoxicated to the point of incapacity to give consent are recognized as incapable of consenting to sexual activities under Philippine law.
- **Conspiracy in Rape:** The collective action of multiple individuals in the commission of a rape, evidenced by coordinated actions before, during, or after the act, establishes conspiracy, making all participants equally liable.
- **Credibility of Victim's Testimony:** The credibility of the rape victim's account, especially when there's no indication of any ulterior motive, is given considerable weight in determining the guilt of the accused.
- **Elements of Rape:**
 1. The offender had carnal knowledge of the victim.
 2. The act was accomplished through force, intimidation, or when the victim is incapable of giving consent due to reasons such as intoxication, unconsciousness, or any other condition.

Historical Background:

This case emphasizes the Philippine legal system's stance on the gravity of rape and the protection of victims' rights. It exemplifies the challenges in proving rape cases, the evaluation of consent, and the responsibility of courts to consider the entirety of evidence presented.