

Title: **People of the Philippines vs. Conrado Barangan y Generalao**

Facts:

Procedural Posture: Conrado Barangan y Generalao was charged with the crime of rape in the Regional Trial Court (RTC), Branch 32, Surigao City, under Criminal Case No. 782. After being found guilty and sentenced to reclusion perpetua, Barangan appealed to the Court of Appeals, which affirmed the RTC's decision. Subsequently, he sought review from the Philippine Supreme Court.

The prosecution's narrative detailed how Barangan allegedly raped a 15-year-old girl, identified only as AAA, in her home. The evidences from the prosecution included testimonies from AAA, the medical officer who examined her, the Punong Barangay (village chief), and a neighbor. AAA's testimony depicted a harrowing scene where Barangan, only wearing briefs, forcibly had sexual intercourse with her, despite her efforts to resist.

On the other hand, Barangan admitted to having sexual intercourse with AAA but claimed it was consensual, stemming from an implied sweetheart relationship. However, his defense, which sought to portray the interaction as consensual, was deemed by both the RTC and the Court of Appeals as insufficient to overturn the assertion of rape.

Issues:

1. Whether the sexual intercourse between Barangan and AAA was consensual.
2. Whether the absence of external injuries on AAA negates the assertion of rape.
3. The appropriateness of the penalties and damages awarded.

Court's Decision:

The Supreme Court affirmed the decision of the Court of Appeals but modified the awards to include exemplary damages. The Court found that there was substantial evidence to prove beyond reasonable doubt that Barangan had indeed committed rape. The assertion of a sweetheart relationship was found to be a weak defense that did not suffice to prove consent, especially in the lack of concrete evidence of such a relationship. The Court also noted that the absence of external signs of physical injuries does not preclude the occurrence of rape, as force and intimidation were sufficiently demonstrated.

Doctrine:

The sweetheart defense, without substantial and tangible proof, is insufficient to disprove allegations of rape, especially when there is credible testimony corroborated by medical findings of forced sexual intercourse. Furthermore, the absence of external injuries does not negate the occurrence of rape if there is sufficient evidence proving force or intimidation.

Class Notes:

1. **Corpus Delicti in Rape Cases:** Must prove that the accused had carnal knowledge of the victim and that such act was accomplished through force, intimidation, or the victim's incapacity to give consent.
2. **Burden of Proof:** Shifts to the accused when claiming consensual sex in rape cases, especially when there is strong and credible testimony from the victim.
3. **Sweetheart Defense:** A claim that there was a romantic relationship between the accused and the victim, which purportedly led to consensual sex, is not a strong defense against rape without concrete and corroborative evidence.
4. **Physical Injuries:** The absence of external injuries on a rape victim is not definitive proof of consent. Rape can occur through intimidation or coercion without leaving physical signs of violence.
5. **Exemplary Damages:** Awarded in addition to civil indemnity and moral damages in rape cases where aggravating circumstances, such as committing the offense in the victim's dwelling, are present.

Historical Background:

The case highlights the evolving legal and societal understanding of consent and sexual violence in the Philippines. It underscores the judiciary's role in scrutinizing defenses and claims in rape cases, especially the oft-misused sweetheart defense, in the broader context of protecting victims' rights and ensuring justice.