

### \*\*Title: People of the Philippines vs. Ruben Corpuz y Simon\*\*

### \*\*Facts:\*\*

Ruben Corpuz was charged with 6 separate counts of rape against his stepdaughter, identified as AAA, in 2002 in Conner, Apayao. The charges indicated that Corpuz, leveraging his position as the live-in partner of AAA's mother, committed the rapes by force and intimidation, threatening the lives of AAA and her mother and employing a knife and a gun to enforce compliance. Following Corpuz's arraignment where he pleaded not guilty, the case proceeded to trial. Corpuz admitted to having sexual intercourse with AAA but contested the use of force, presenting a "sweetheart defense," suggesting a consensual relationship.

The prosecution's evidence primarily came from AAA's testimony, detailing how Corpuz raped her multiple times at gunpoint while her mother was away. The emotional and physical toll on AAA was corroborated by medical examinations and a social case study report. Despite these allegations, Corpuz maintained the sexual relations were consensual.

The Regional Trial Court of Luna, Apayao found Corpuz guilty of qualified rape, sentencing him to the death penalty for each count. This decision was modified by the Court of Appeals, which recognized the crimes as simple rape, thereby commuting Corpuz's sentence to reclusion perpetua for each count due to errors in specifying the familial relationship in the charges.

### \*\*Issues:\*\*

1. The credibility of AAA's testimony against Corpuz's "sweetheart defense."
2. The proper characterization of the rape charges (qualified vs. simple rape) based on the relationship and conduct described.
3. The imposition of correct penalties and damages consistent with Philippine law.

### \*\*Court's Decision:\*\*

The Supreme Court upheld the appellate court's findings with modifications:

- Asserted the credibility of AAA's testimony over Corpuz's defense, citing the consistent and straightforward recount of the events by AAA.
- Affirmed the reclassification of the crimes to simple rape due to insufficient specification and proof of the "stepfather-stepdaughter" relationship being a qualifying circumstance.

- Modified the damages awarded, affirming the moral and exemplary damages but adjusting the civil indemnity to P50,000 per count of rape, in line with jurisprudence on simple rape.

### **\*\*Doctrine(s):\*\***

- In rape cases, the credibility of the victim's testimony is paramount, especially when supported by unambiguous, straightforward recounts of the abuse.
- The presence of moral ascendancy can substitute for physical force or intimidation in rape cases involving close familial relations.
- The penalties and qualifications for rape charges are contingent on the specific circumstances of the case, including the relationship between the victim and the perpetrator and the evidence of such a relationship.

### **\*\*Class Notes:\*\***

- Rape can be classified as qualified or simple based on specific qualifying circumstances (e.g., relationship, use of weapon, age of the victim). Qualified rape carries heavier penalties.
- Moral ascendancy or relationship dynamics can play a crucial role in the absence of physical force or intimidation.
- The defense's burden of proof in "sweetheart" cases requires substantial and convincing evidence beyond mere testimonial claims.
- Consistency in victim testimony, particularly during cross-examination, significantly impacts case outcomes in rape charges.
- Legal distinctions in defining relationships (e.g., common-law spouse vs. legal spouse) can affect the qualification and penalties of rape charges.

### **\*\*Historical Background:\*\***

This case highlights the stringent evaluation of rape charges within the Philippine judicial system, especially regarding the burden of proof, the impact of familial relations on case qualification, and the importance of specifying relationships accurately in legal charges. It reiterates established principles, such as the significant weight given to the victim's testimony and the necessity of corroborative evidence in affirming defenses in rape cases. It also underscores evolving legal interpretations and applications in addressing sexual violence within complex family dynamics.