

Title: People of the Philippines vs. Butchoy de la Torre and Fe de la Torre

Facts:

In September, October, and December 1992, in Barangay Tumarbong, Roxas, Palawan, appellant-spouses Butchoy and Fe de la Torre were accused of raping sixteen-year-old Baby Jane Dagot in a series of nine separate incidents. The couple was charged via nine amended complaints, with the first incident alleged to have occurred in the second week of September 1992. The subsequent complaints detailed rapes carried out roughly once a week until the fourth week of October and then again in the second week of December 1992.

Baby Jane testified that the initial rape involved Fe de la Torre waking both her husband and Baby Jane in the middle of the night, threatening Baby Jane with a bladed weapon to comply, and instructing Butchoy to have sexual intercourse with Baby Jane. Similar incidents followed, occurring once a week, except for November 1992. Butchoy de la Torre and Fe de la Torre were tried and found guilty by the Regional Trial Court of Palawan and Puerto Princesa City, Branch 47, and sentenced to reclusion perpetua for each of the nine counts of rape.

Upon appeal to the Supreme Court, the appellants challenged the credibility of Baby Jane's testimony and argued their constitutional right to presumption of innocence was violated.

Issues:

1. The credibility of Baby Jane Dagot's testimony regarding the nine incidents of rape.
2. Whether the manner in which the crimes were committed, specifically the involvement of Fe de la Torre, affects the believability of the accusations.

Court's Decision:

The Supreme Court modified the trial court's decision, acquitting the appellants for eight of the nine rape charges due to insufficient evidence of guilt beyond reasonable doubt for those incidents. However, the Court found the evidence sufficient to affirm the conviction for the initial rape in the first week of September 1992, where Baby Jane's testimony provided a detailed account of the incident.

For the first rape incident, the Court ruled that both appellants were guilty beyond reasonable doubt of rape qualified with the use of a deadly weapon and sentenced them to reclusion perpetua. Additionally, they were ordered to indemnify Baby Jane P50,000 as civil indemnity, P50,000 as moral damages, and P25,000 as exemplary damages.

Doctrine:

The decision reiterates the principle that each charge of rape is a distinct crime that must be proven beyond reasonable doubt. Further, it confirmed that the credibility of a witness is determined by the witness' conformity to the knowledge and consistency with the experience of mankind. Moreover, the Court highlighted that a woman, alongside a man, can commit acts of rape provided that her participation is indispensable to the commission of the crime.

Class Notes:

- In prosecutions for rape, the credibility of the victim's testimony is pivotal.
- Each count of rape must be proved beyond reasonable doubt.
- A woman can be found guilty of rape if her participation is considered indispensable cooperation.
- The determination of the credibility of witnesses by trial courts is afforded the highest respect unless it is shown that facts or circumstances of substance were overlooked.
- Conviction for rape qualified by the use of a deadly weapon includes indemnity and damages: P50,000 as civil indemnity, P50,000 for moral damages, and P25,000 as exemplary damages.

Historical Background:

This case is significant in Philippine legal history for addressing the relatively rare occurrence of a woman, alongside her husband, being convicted of rape, which challenges typical narratives around the commission of sexual violence. It underscores the judiciary's role in scrutinizing evidence for each alleged crime and upholding the standard of proof required for conviction. The case reflects the legal system's mechanisms for ensuring that justice is served while emphasizing the importance of the presumption of innocence.