

Title: People of the Philippines vs. Edgar Allan Corpuz y Flores

Facts:

The case involved Edgar Allan Corpuz y Flores, charged with four counts of rape committed against AAA, a 14-year-old with a mental capacity of a 5-year-old and 8-month-old child. The incidents occurred in Barangay Puelay, Villasis, Pangasinan, across various dates in 2002. Corpuz pleaded not guilty. During the trial, witnesses for the prosecution included AAA's family members and medical professionals who attested to her mental condition and the sexual assaults. The defense argued that the charges were fabricated, stemming from a personal grudge by AAA's family. The Regional Trial Court found Corpuz guilty, a decision upheld by the Court of Appeals, leading to an appeal to the Supreme Court.

Issues:

1. Whether the testimony of an intellectually disabled victim is admissible and credible.
2. Whether Corpuz's guilt was proven beyond reasonable doubt.
3. The appropriate application and interpretation of the Philippine Revised Penal Code concerning rape, particularly when involving an intellectually disabled victim.

Court's Decision:

The Supreme Court affirmed the appellate court's decision, emphasizing that intellectual disability does not preclude one from being a credible witness if they competently recount their experience. AAA's coherent testimony, despite her disability, was deemed credible and sufficient for Corpuz's conviction. The Court reiterated that physical force or intimidation need not be proven in cases where the victim is incapable of giving consent, as in AAA's situation.

Doctrine:

1. An intellectually disabled individual is capable of being a witness if they can competently convey their perception of events.
2. Sexual intercourse with an intellectually disabled person, who cannot give consent, qualifies as rape under the Revised Penal Code of the Philippines, as amended.

Class Notes:

- Consent: In rape cases involving mentally incapacitated victims, the focus is not on

physical force or intimidation but on the victim's capacity to consent.

- Witness Credibility: Intellectual disability does not inherently discredit a witness's testimony if they can meaningfully recount their experiences.
- Rape Convictions: Convictions can rest on the victim's testimony if found credible, without needing corroboration.
- Legal provisions: Article 266-A of the Revised Penal Code (Rape; When And How Committed) is crucial, particularly in cases involving victims who are "deprived of reason or otherwise unconscious."

Historical Background:

The case reflects judicial recognition of the rights and capabilities of intellectually disabled individuals to seek justice against sexual violence. It underscores the importance of evaluating a witness's credibility based on their ability to understand and communicate about their experience, not solely on their intellectual capacity.