

Title: The People of the Philippines vs. Romar Teodoro y Vallejo

Facts:

The case involves the conviction of Romar Teodoro (appellant) for two counts of statutory rape committed against a minor, herein referred to as AAA, with the acts occurring on June 18, 1995, and the first week of July 1995, in Barangay Pook ni Banal, San Pascual, Batangas, Philippines. AAA was below twelve years old at the time of the incidents. The appellant was an employee of AAA's parents and had lived with AAA's family for approximately three years. The Regional Trial Court (RTC) of Batangas City found the appellant guilty beyond reasonable doubt and sentenced him to reclusion perpetua for each count. The appellant appealed to the Supreme Court after the Court of Appeals (CA) affirmed the RTC's decision in toto.

During the trial, prosecution witnesses included AAA, who provided a detailed account of the assaults, a medical officer who examined her the day following one of the incidents, and a medical technologist who confirmed the presence of sperm cells in her vaginal smear. The appellant denied the allegations and claimed that his sexual interaction with AAA on March 30, 1996, was consensual, emphasizing that he did not commit the crimes charged for June 18, 1995, and the first week of July 1995.

Issues:

1. Sufficiency of the prosecution's evidence to prove guilt beyond reasonable doubt.
2. Credibility and consistency of AAA's testimony.
3. Alleged defectiveness of the Information in Criminal Case No. 8539 due to the unspecified date of the crime.
4. Proper penalties and indemnities for statutory rape.

Court's Decision:

1. **Sufficiency of Prosecution Evidence**: The Court upheld the finding of guilt, emphasizing that statutory rape does not consider force or intimidation but focuses on the age of the victim and the act of engaging in sexual intercourse. AAA's consistent and credible testimony, corroborated by medical findings, sufficiently proved the appellant's guilt.
2. **Credibility and Consistency of Testimony**: The Court found AAA's testimony to be credible, natural, convincing, and consistently corroborated by medical evidence, thus sufficient to support a conviction.

3. **Information Defectiveness**: The Court rejected the appellant's argument regarding the inadequacy of the Information in Criminal Case No. 8539, citing rules that do not require the exact date of the commission of the crime in the Information, as long as it sufficiently informs the accused to enable preparation for defense.

4. **Penalties and Indemnities**: The Court affirmed the imposition of reclusion perpetua for each count of statutory rape, modifying the awarded indemnities to include moral and exemplary damages, based on prevailing jurisprudence.

Doctrine:

1. **Statutory Rape**: When the victim is below 12 years old, the only considerations are the victim's age and whether sexual intercourse occurred. Force, intimidation, and consent are irrelevant.

2. **Information Sufficiency**: An Information is deemed sufficient if it states the approximate time of the commission of the offense and enables the accused to adequately prepare for defense. The exact date is not necessary unless it is a material element of the offense.

Class Notes:

- **Elements of Statutory Rape**: The victim is below 12 years old, and carnal knowledge occurs. Consent or force is immaterial.

- **Rule on Information Specificity**: Precise date of crime is not required unless it is a material element. The key is that the accused can prepare a defense.

- **Credibility of Testimony**: The testimony of a minor rape victim is given full credence, especially when corroborated by medical evidence.

- **Defense Strategy**: Mere denial cannot overcome positive identification and consistent testimony.

- **Penalties and Indemnities for Statutory Rape**: Reclusion perpetua; mandatory civil indemnity and moral damages; exemplary damages may be awarded.

Historical Background:

This case reflects the Philippine legal system's approach to handling crimes against minors, especially in instances of sexual abuse. Statutory rape laws in the Philippines emphasize protection for minors, recognizing their incapacity to give informed consent. The case also highlights procedural aspects regarding the sufficiency of information in criminal charges and the standard for assessing the credibility of testimonies in sexual assault cases.