

Title: People of the Philippines vs. Rolly Canares y Almanares

Facts:

The accused, Rolly Canares y Almanares (Canares), faced two separate Informations in the Regional Trial Court (RTC) of Tagaytay City, Branch 18. The first, Criminal Case No. TG-3255-99, charged him with the statutory rape of AAA, a minor, sometime between 1992 to 1995 in Cavite. The second, Criminal Case No. SC-3261-00, pertained to an attempted rape on March 25, 1999. Both were linked to Republic Act No. 7610 (the Child Abuse Law). Canares denied both charges, leading to a joint trial due to the cases involving the same parties and subject matters.

During the trial, the prosecution presented AAA, the victim, BBB (AAA's aunt), and Dr. Bernadette Madrid as witnesses. Canares relied on denial as a defense. AAA testified that the first instance of abuse by Canares, then a helper in her grandmother's house, occurred when she was around 9 or 10 years old, detailing that Canares had carnal knowledge of her more than ten times until 1995, with a hiatus until 1999 due to lack of opportunity. The last incident prompted AAA to disclose the abuses. Medical examination confirmed her previous sexual abuse. Canares contended the motive behind the charges was financial.

The RTC found Canares guilty of statutory rape, sentencing him to reclusion perpetua and ordering him to pay damages. However, it acquitted him of attempted rape. The Court of Appeals (CA) affirmed the RTC's decision with modification, adjusting the amount of damages awarded.

Issues:

1. Whether the Information filed was inadequately specific regarding the date of the alleged rape.
2. The credibility of AAA's testimony and the sufficiency of evidence for statutory rape conviction.
3. Applicability of statutory rape provisions given the absence of force or intimidation.
4. Proper penalties and damages under applicable laws preceding the Anti-Rape Law of 1997 and Republic Act No. 7659.

Court's Decision:

The Supreme Court affirmed Canares' conviction, rejecting his contention that the Information's vagueness on the date rendered it defective. It underlined jurisprudence that exact dates are not crucial in rape charges unless forming an offense's essence. AAA's

consistent and categorical testimonies, supported by medical evidence, sufficiently informed Canares of the charges, meeting the substantial compliance standard. The Court also highlighted the inherent weakness of Canares' denial against positive identification and credible testimony. The imposition of reclusion perpetua, civil indemnity, moral, and exemplary damages was upheld based on established jurisprudence, reflecting the crime's gravity and serving as a deterrent.

Doctrine:

The ruling reiterated the doctrine that the exact date of rape commission is unnecessary unless integral to the crime itself. It reaffirmed the principle that in statutory rape cases, force or intimidation need not be proven—carnal knowledge of a minor below 12 conclusively presumes coercion. Also, positive identification and credible witness testimony outweigh the defense of denial.

Class Notes:

1. **Statutory Rape Elements**: (a) Age of the complainant below 12; (b) Identity of the accused; (c) Carnal knowledge between the accused and the complainant.
2. **Doctrine on Information Date Specificity**: Exact dates in information for rape are not crucial unless it forms the essence of the offense. Any ambiguity can be cured by detailed testimonial or evidentiary presentation during trial (Section 6 Rule 110, 2000 Revised Rules on Criminal Procedure).
3. **Denial vs. Positive Testimony**: Denial, being inherently weak, must be significantly substantiated to be credible, especially against positive identification and credible testimony.
4. **Penalty and Damages for Statutory Rape Prior to R.A. 7659 and R.A. 8353**: Statutory rape committed before the effectivity of relevant amending laws warrants reclusion perpetua, with civil indemnity and moral damages awarded as matter of jurisprudential policy, and exemplary damages to set a public example.

Historical Background:

The case against Canares is emblematic of the Philippines' evolving legal framework on sexual violence and child protection. Occurring before the enactment of R.A. 8353, which redefined and expanded the concept of rape, and R.A. 9262, providing stronger protections against violence toward women and children, this case is grounded in the legal context of its time, specifically under the provisions of R.A. 7610 and the Revised Penal Code's Article 335. It underscores the legal system's commitment to protecting children against sexual abuse, reflecting broader societal and legislative efforts to address and deter such crimes.