

Title:

****People of the Philippines v. Adelado Anguac****

Facts:

Accused-appellant Adelado Anguac, in a series of events from March 28, 1998, to February 1999, in Palauig, Zambales, was accused of raping AAA, the 17-year-old minor daughter of his common-law spouse, BBB, under threats of bodily harm. The assaults resulted in AAA becoming pregnant and giving birth to a son in October 1999. Upon discovery of the repeated abuse, aunts of AAA assisted her in filing a police complaint against Anguac. Subsequently, two separate informations were filed against him for rape and violation of RA 7610, Section 5(a), respectively.

Anguac pleaded not guilty and denied the accusations, supported by the testimony of BBB. However, the Regional Trial Court (RTC) found AAA to be credible and, on January 23, 2002, convicted Anguac as charged, sentencing him to reclusion perpetua for rape and reclusion temporal for the violation under RA 7610. Anguac appealed to the Supreme Court, which then transferred the case to the Court of Appeals (CA) in line with the ruling in *People v. Mateo*. The CA affirmed the RTC's decision with modifications, particularly adjusting the monetary awards and changing the violation from Section 5(a) to Section 5(b) of RA 7610.

Issues:

1. Credibility of the witnesses for the prosecution, especially that of AAA.
2. Sufficiency of the prosecution's evidence to establish the guilt of the accused beyond reasonable doubt.

Court's Decision:

The Supreme Court upheld the findings of the lower courts, denying Anguac's appeal on the grounds that the detailed and consistent testimony of the victim, AAA, was found credible and sufficient to establish guilt beyond reasonable doubt. The Court also affirmed the CA's modification regarding the charges under RA 7610 from Section 5(a) to Section 5(b), consistent with the facts presented.

Doctrine:

The Supreme Court reiterated the principle that the sole testimony of a rape victim, if credible, is sufficient for conviction. It also highlighted the determination of the character of the crime based on the facts and circumstances presented in the information, rather than the specified legal provisions or titles.

Class Notes:

- **Rape**: Conviction can rest solely on the credible and consistent testimony of the victim, especially in the absence of ill motive for falsely testifying.
- **RA 7610 Violations**: The specific section under which one is charged (5(a) vs. 5(b)) depends on the nature of the acts committed, with sexual intercourse or lascivious conduct falling under Section 5(b) when involving a minor.
- **Credibility of Witness**: The demeanor, manner of testifying, and consistency of the witness, particularly the victim in criminal cases, play a critical role in the determination of credibility by the trial court, whose assessment is given significant weight on appeal.
- **Modification of Charges**: The real nature of the crime is determined by the recital of facts in the information, not the title or designation contained in the caption, allowing judicial modification consistent with the facts presented.

Historical Background:

This case reflects the legal system's handling of sexual abuse against minors within domestic settings and underscores the importance of protecting children under Philippine law, particularly highlighting the application of RA 7610 provisions in prosecuting offenses involving sexual abuse or exploitation of minors.