

****Title:**** People of the Philippines v. Melchor Cabalquinto

****Facts:****

The case revolves around the conviction of Melchor Cabalquinto (“Cabalquinto”) for the rape of his 8-year-old daughter, identified through pseudonyms as AAA, in November 1998 in Quezon City, Philippines. The trial that led to Cabalquinto’s conviction unfolded after AAA, assisted by her mother ABC, filed a sworn statement detailing two incidents of rape. This prompted the filing of two Informations for rape against Cabalquinto, to which he pleaded not guilty. Following the trial, the Regional Trial Court of Quezon City convicted Cabalquinto on two counts of rape and sentenced him to death, alongside ordering him to indemnify AAA. On automatic review due to the death sentence, the Supreme Court directed for briefs from the parties. It later transferred the case to the Court of Appeals in line with *People v. Efren Mateo*, after which the appellate court affirmed the trial court’s decision with modifications regarding damages awarded. The case then returned to the Supreme Court for final review.

****Issues:****

The Supreme Court was tasked with addressing several issues:

1. Whether the testimonies of the victim AAA and her mother ABC contained discrepancies significant enough to affect their credibility and the case’s outcome.
2. The appropriateness of Cabalquinto’s conviction based on the evidence and testimonies presented during the trial.
3. The determination of the appropriate penalty in light of RA 9346, which prohibits the imposition of the death penalty.
4. The extent and nature of civil liabilities owed to AAA.

****Court’s Decision:****

The Supreme Court affirmed Cabalquinto’s conviction for two counts of rape with modification on the penalties and damages awarded due to legislative changes regarding the death penalty. The court found no significant inconsistencies in the testimonies of AAA and ABC that would impact the reliability of their accounts. It rejected Cabalquinto’s defense as implausible and underscored the strength of the testimonies and medical evidence supporting the conviction. The court also adjusted the penalties and awards for damages in compliance with RA 9346, prohibiting the death penalty, thus sentencing Cabalquinto to reclusion perpetua without eligibility for parole and modifying the damages awarded to AAA.

****Doctrine:****

The case reiterated the legal principles surrounding the confidentiality and privacy rights of child abuse victims under Republic Act No. 7610 and RA 9262. It established that the real names of victim-survivors and any information that could compromise their identities should not be disclosed, recognizing the sensitive nature of such cases and aiming to protect the victims' dignity and privacy.

****Class Notes:****

- ****Rape of a Minor:**** Carnal knowledge of a woman under 12 years old constitutes statutory rape, with the qualifying circumstance of the offender being a parent leading to higher penalties.
- ****Confidentiality in Child Abuse Cases:**** The identities of child abuse victims and any information that could reveal their identities are subject to confidentiality, reflecting statutes that intend to safeguard the victims' privacy and dignity.
- ****Credibility of Witness Testimony:**** Inconsistencies in minor details of victim and witness testimonies do not automatically discredit their account, especially when recounting traumatic experiences.
- ****Civil Liabilities for Rape:**** Beyond criminal penalties, offenders are liable to compensate victims through civil indemnity, moral damages, and exemplary damages to address the non-pecuniary and pecuniary damages resulting from the crime.

****Historical Background:****

This decision reflects the evolving jurisprudence on handling child abuse and sexual violence cases in the Philippines. It underscores the implementation of RA 7610 and RA 9262, emphasizing the state's commitment to child protection and respecting victims' rights to privacy and confidentiality. This case illustrates the judiciary's role in balancing the public's right to information with protecting victims' dignity and encouraging the reporting of abuses without fear of stigmatization.