

**\*\*Title:\*\*** People of the Philippines vs. Joel “Anjoy” Buca

**\*\*Facts:\*\***

The case revolves around the accusation against Joel “Anjoy” Buca (hereafter referred to as Buca) for the rape of a seven-year-old girl, herein referred to as AAA, which occurred on December 24, 2002, in Davao City, Philippines. On the eventful day, Buca, a neighbor, entered AAA’s residence, isolating her from her siblings by instructing them to sleep in another room. He then proceeded to sexually assault AAA. CCC, AAA’s younger brother who was hiding, witnessed the act, which prompted the reporting of the incident to the police and the medical examination of AAA that confirmed signs of sexual abuse.

Three Informations for rape were filed against Buca, relating to incidents occurring sometime before, on, and sometime after December 24, 2002. Only the case concerning the act on December 24, 2002 (Criminal Case No. 52,261-2003), led to a conviction, with the Regional Trial Court (RTC) dismissing the other two for lack of evidence and failure to prove guilt beyond reasonable doubt, respectively. Buca denied the allegations, claiming he was merely asked to watch over AAA and her siblings and left for work without any unusual incident.

**\*\*Issues:\*\***

1. Whether Buca is guilty of committing rape.
2. Whether Buca can be convicted of rape despite the Information not stating the exact date of the crime’s commission.

**\*\*Court’s Decision:\*\***

1. **\*\*On Guilt:\*\*** The Supreme Court (SC) affirmed the conviction, finding the testimony of AAA, corroborated by CCC, credible and sufficient to establish the elements of rape. The SC emphasized the credibility accorded to rape victims’ testimonies, especially minors’, and upheld the lower courts’ findings.
2. **\*\*On the Date of Commission:\*\*** The SC held that the precise date is not an essential element of rape and that the Information’s statement that the rape occurred “sometime before December 24, 2002” did not render it defective nor violate Buca’s rights. It ruled that the Information sufficiently informed Buca of the charges, enabling him to prepare his defense.

**\*\*Doctrine:\*\***

1. The exact date of the commission of rape is not an essential element of the crime.

2. Minor inconsistencies in testimonies regarding details not central to the elements of the crime do not undermine the credibility of witnesses.

3. The credible, straightforward, and consistent testimony of a rape victim is sufficient to support a conviction.

**\*\*Class Notes:\*\***

- Essential Elements of Rape under Philippine Law: (a) Sexual congress with a woman or a child under circumstances listed under Article 266-A of the Revised Penal Code, as amended; (b) The victim is under 12 years of age or is demented; (c) The act is done through force, threat, or intimidation; (d) The victim is deprived of reason or otherwise unconscious; (e) By means of fraudulent machination or grave abuse of authority.

- The credibility of rape victims, especially minors, is generally considered intact despite minor inconsistencies in their testimonies.

- Failure to specify the exact dates of the commission of rape does not automatically make the Information defective, as long as the crime's allegations enable the accused to adequately prepare for defense.

**\*\*Historical Background:\*\***

The case highlights the Philippine judiciary's standards in evaluating evidence in rape cases, particularly valuing the testimonies of child victims and emphasizing the non-necessity of specifying the exact date of rape occurrence. This reflects the legal system's focus on justice for victims while ensuring the accused's rights are respected, within the broader historical context of evolving protections against sexual violence in the country.