

Title

People of the Philippines vs. Melquiades Fernandez alias “Moding” and Federico Conrado

Facts

This case involved the conviction of Melquiades Fernandez and Federico Conrado for the crime of rape against Rebecca M. Soriano, which occurred on January 13, 1982, in Pangasinan. The procedural journey to the Supreme Court began with the filing of a criminal complaint by the victim on June 2, 1982. During the trial at the Court of First Instance of Pangasinan, Branch I, both defendants pleaded not guilty and underwent trial. The prosecution built its case through the testimony of the victim, witnesses Amelita Malong and Teofilo Malong, and the presentation of a medico-legal certificate showing evidence of rape. The defense of Fernandez and Conrado was anchored on alibi, which was not corroborated by any witness. The trial court found both accused guilty beyond reasonable doubt, sentencing them each to two death penalties, moral damages, and the costs of the suit. Federico Conrado, subsequently appealed the decision, challenging the conviction for two crimes of rape, the aggravating circumstance of cruelty or ignominy, and the imposition of the death penalty.

Issues

1. Whether the trial court violated the rule against duplicity of offenses by convicting the accused for two crimes of rape based on one criminal complaint.
2. Whether the aggravating circumstance of cruelty or ignominy was rightly appreciated by the trial court.
3. Whether the imposition of the death penalty was correct and in accordance with the law.

Court’s Decision

The Supreme Court found no merit in Conrado’s appeal. On the first issue, the Court held that any objection to the supposed duplicity of offenses was waived since it was not raised earlier. Furthermore, the Court justified the two convictions based on the existence of conspiracy between the accused, which made both liable for each act of rape. On the second issue, the Court agreed with the trial court’s finding of ignominy due to the greater perversity displayed by the offenders but decided that the term “cruelty” was unnecessary. Lastly, regarding the death penalty, the Court acknowledged that although the original sentence was correct at the time, constitutional changes mandated the reduction of the death penalty to reclusion perpetua. Thus, Conrado’s sentence was adjusted to two reclusion perpetua penalties, and the moral damages were increased to P20,000.00 in accordance with prevailing jurisprudence.

Doctrine

The case reaffirmed the principle that in instances of conspiracy in the commission of multiple rapes, each accused is held liable for all the rapes committed by the co-conspirators. Moreover, the case demonstrates the application of constitutional amendments to sentencing, specifically the reduction of the death penalty to reclusion perpetua in compliance with the 1987 Philippine Constitution.

Class Notes

- ****Conspiracy in Rape Cases****: When multiple individuals conspire to commit rape, each participant is liable not only for the rape he personally commits but also for the rape committed by his co-conspirators.
- ****Duplicity of Offenses****: The objection to charging more than one offense in a criminal complaint or information must be raised before trial through a motion to quash; failure to do so constitutes a waiver of such objection.
- ****Aggravating Circumstances****: The aggravating circumstance of ignominy applies when there's a showing of greater perversity or shamefulness in the act of rape, augmenting the sufferance of the victim.
- ****Sentencing under the 1987 Constitution****: The imposition of the death penalty is prohibited under the 1987 Philippine Constitution, thus mandating the reduction of death penalties to reclusion perpetua.

Historical Background

This case reflects the legal and societal attitudes toward rape and the treatment of aggravating circumstances in sentencing during the early 1980s in the Philippines. It also illustrates the impact of the 1987 Philippine Constitution on the reevaluation of previously imposed death penalties, showcasing the dynamic interplay between evolving legal standards and human rights considerations in the Philippine judicial system.