

Title:

****Jaime Capueta y Ataday vs. People of the Philippines****

Facts:

This case originates from a charge against Jaime Capueta y Ataday for violation of Section 10(a) of Republic Act No. 7610 (Special Protection of Children Against Abuse, Exploitation, and Discrimination Act), specifically accused of committing acts of lasciviousness against a 6-year-old minor, referred to as “AAA”. The information detailed that Capueta, with lewd design, wilfully, unlawfully, and feloniously committed acts of child abuse by touching the minor’s legs, arms, and private organ. Capueta pleaded not guilty, leading to a full trial.

During the trial, the prosecution presented AAA, her mother BBB, and Barangay Tanod Arnel Carias as witnesses. The evidence showed that on the afternoon of November 16, 2008, Capueta molested AAA at his sister’s house. After the incident, AAA informed the mother, which led to Capueta’s arrest and subsequent police investigation. The prosecution offered various documentary evidence, including the victim’s birth certificate establishing her age.

Capueta defended himself by claiming he accidentally fell on AAA while descending stairs and denied any malintent or contact with AAA’s private parts. Despite his narrative, the Regional Trial Court found him guilty of the crime, underlining the inconsistencies and unconvincing nature of his defense against the straightforward and credible testimonies of the prosecution’s witnesses.

The case proceeded to the Court of Appeals, which affirmed the RTC’s decision, albeit with modifications to the penalty imposed, based on the absence of any mitigating or aggravating circumstances.

Issues:

1. Whether Capueta was guilty beyond a reasonable doubt of acts of lasciviousness in relation to Section 5(b) of RA 7610.
2. Whether the information filed sufficiently informed Capueta of the nature and cause of accusation against him.
3. Whether the presence of the necessary elements under Section 5(b) of RA 7610 was proven.

Court’s Decision:

The Supreme Court denied the petition for review on certiorari, affirming the decisions of

both the RTC and the Court of Appeals with modifications related to the awarding of damages. The Court highlighted the credible testimony of AAA, who consistently recounted the incident, and deemed it sufficient to support a conviction. The Court found all elements of sexual abuse under RA 7610 substantiated, namely the commission of lascivious conduct, with the victim being under 18 years of age and specified as being exploited or subjected to sexual abuse under the law.

The Court also addressed the petitioner's contention about the sufficiency of the information, reiterating jurisprudence stating that what controls are the facts alleged in the body of the information, not the title or the specific law cited. The Court held that the facts alleged clearly constituted the offense charged, hence the petitioner's right to be informed of the accusation against him was not violated.

Doctrine:

The Court reiterated the doctrine that the credibility of minor victims of sexual abuse is given weight, especially when their testimony is consistent and categorical. It also confirmed that the actual recital of facts in the information, and not the designation of the offense, determines the sufficiency to inform the accused of the charges against them.

Class Notes:

- The elements necessary for a conviction under Section 5(b) of RA 7610 include (1) lascivious conduct or sexual intercourse (2) with a child exploited in prostitution or subjected to sexual abuse, and (3) the child being below 18 years of age.
- The credibility of young and immature victims' testimonies is given significant weight, especially in sexual abuse cases.
- The information need not specify the law violated as long as the facts constitute the offense charged.

Historical Background:

This case reflects the Philippine judiciary's stringent approach towards crimes involving child abuse under RA 7610, emphasizing the protection of minors from sexual abuse and exploitation. It showcases the processes involved in adjudicating such sensitive matters, from trial courts through appeals, underscoring the importance of precise fact-finding and the interpretation of laws in safeguarding children's rights.