

Title: People of the Philippines vs. William Ching

Facts:

The case involves William Ching, accused of committing three counts of rape against his minor daughter, identified as AAA, in 1996 and twice in May 1998. The Quezon City Regional Trial Court (RTC), Branch 107, originally heard the criminal cases (No. Q-99-87053, Q-99-87054, and Q-99-87055), which were subsequently consolidated for a joint trial.

Upon arraignment on March 6, 2000, Ching, with counsel, pleaded “Not Guilty” to each charge. The prosecution presented multiple witnesses, including the victim, her mother, law enforcement officers, and a medical expert, establishing the sequence of the criminal actions, the psychological and physical impact on the victim, and the investigation’s course. The defense consisted solely of Ching’s testimony, denying the allegations.

Following the trial, on July 27, 2004, the RTC found Ching guilty, sentencing him to reclusion perpetua for the first count and the death penalty for the subsequent counts. This decision was elevated to the Court of Appeals due to the involvement of the death penalty, where the sentence was modified to reclusion perpetua for all counts, in light of R.A. 9346, prohibiting the death penalty. Ching’s appeal to the Supreme Court argued the insufficiency of the informations filed against him, specifically challenging the lack of precise dates of the offenses.

Issues:

1. Whether the informations filed were sufficient to support a judgment of conviction despite not stating the approximate date of the commission of the alleged rapes.
2. The appropriateness of the penalties imposed in light of the laws and circumstances surrounding the commission of the crimes.

Court’s Decision:

The Supreme Court dismissed Ching’s contention, upholding the sufficiency of the informations. It emphasized that the exact date of the commission of rape is not a material element of the offense, and the information need only state the crime’s occurrence as near as possible to the actual date. Hence, stating the year and/or the month was deemed sufficient. The Court also affirmed the modifications made by the Court of Appeals to the

sentence in accordance with Republic Act No. 9346, which abolished the death penalty. As such, Ching was sentenced to reclusion perpetua without eligibility for parole.

Doctrine:

The precise date of the commission of rape is not a material element of the crime. An information alleging the month and year of its commission is considered valid and sufficient to inform the accused of the charges against him and to enable his defense preparation.

In lieu of the death penalty, reclusion perpetua shall be imposed, and pursuant to Republic Act No. 9346, individuals convicted of offenses meriting reclusion perpetua as a replacement for the death penalty shall not be eligible for parole.

Class Notes:

1. ****Material Elements of Rape****: Carnal knowledge of a woman against her will or without her consent. The exact date is not necessary for the charge as long as the approximate time is specified.
2. ****Sufficiency of Information****: The necessary elements include the accused's name, offense designation according to statute, constitutive acts or omissions, offended party's name, and offense commission's approximate date and place.
3. ****Penalty Modifications under R.A. 9346****: Abolishes the death penalty, replacing it with reclusion perpetua or life imprisonment, and specifies no parole eligibility for offenses originally meriting the death penalty.

Historical Background:

This case reflects the legal evolution concerning the treatment of rape cases and the imposition of capital punishment in the Philippines. The modifications to the original sentencing reflect the significant impact of R.A. 9346 on capital offenses, demonstrating the judiciary's role in adapting and applying legislative changes to ongoing and appellate cases.