

****Title: People of the Philippines vs. Roberto Quiachon****

****Facts:****

On May 12, 2001, in Pasig City, Roberto Quiachon allegedly raped his 8-year-old daughter, Rowena, who is a deaf-mute. Rowena's brother, Rowel, witnessed the incident. On the morning following the incident, Rowel reported it to their aunt, Carmelita Mateo, who then took them to the police. Rowena, using sign language, confirmed that her father had sexual intercourse with her against her will. A medico-legal report by Dr. Miriam Sta. Romana Guialani supported Rowena's claims with physical evidence of sexual and physical abuse.

Quiachon was arraigned, pleaded not guilty, and during the trial, he presented a defense of denial, suggesting that the accusations were motivated by a familial grudge over property and monetary support. Despite his defense, the prosecution's evidence was deemed credible by the Regional Trial Court (RTC), which convicted Quiachon and sentenced him to death.

The case was automatically elevated to the Supreme Court (SC) due to the imposed death penalty but was transferred to the Court of Appeals (CA) following the ruling in *People v. Mateo*. The CA affirmed the RTC's decision with modifications, confirming his conviction but revising the damages awarded. The case was then referred back to the Supreme Court for final review.

****Issues:****

1. Whether the RTC and CA correctly found Roberto Quiachon guilty of qualified rape.
2. Whether the imposition of the death penalty was appropriate under the circumstances given the subsequent legislative changes.

****Court's Decision:****

1. ****Guilty Verdict Affirmed:**** The SC affirmed the conviction, holding that the testimonies of Rowel and Rowena, corroborated by the medico-legal report of Dr. Guialani, were credible. The Court held that Rowel's and Rowena's testimonies were straightforward and unshaken during cross-examination. The physical findings indicated signs of sexual abuse consistent with Rowena's account.

2. ****Death Penalty Adjusted:**** The SC recognized the passage of Republic Act No. 9346, which prohibits the imposition of the death penalty. Consequently, Quiachon's sentence was reduced to reclusion perpetua (life imprisonment).

****Doctrine:****

The doctrine highlights the importance of credible and straightforward testimonies of victims in rape cases, especially those involving minors and family members. Physical evidence providing corroboration strengthens such testimonies. Additionally, the ruling illustrates the impact of legislative changes on sentencing, emphasizing the retroactive application of laws favorable to the accused.

****Class Notes:****

- ****Elements of Qualified Rape (Art. 266-B, RPC):****
- Sexual intercourse through force or intimidation.
- Victim under 18 years of age.
- Offender is a parent or relative up to the third degree.
- ****Applicable Legal Provisions:****
- Art. 266-A and B of the Revised Penal Code (Rape and its penalties).
- RA No. 9346 (Prohibition of the death penalty).

****Historical Background:****

This case occurred in a period of heightened legislative and judicial scrutiny of sexual offenses, particularly involving minors and custodial relationships. The abolition of the death penalty in 2006 influenced the application of severe penalties for heinous crimes, pushing adjustments in the sentencing framework while maintaining stringent punitive measures against such crimes.

The case underscores the judiciary's steadfastness in protecting vulnerable victims of sexual abuse and the evolving nature of penal legislation in response to human rights standards. The affirmation of the conviction and the adjustment of the sentence serve as a testament to these dynamics.