

Title: People of the Philippines vs. Marcelino Caga y Fabre

Facts:

1. **Incident and Initial Reports (September 17, 2006):**

- “AAA” and her boyfriend, Randy Bomita, visited Marcelino Caga’s house in Pandacan, Manila, for a drinking spree.
- After consuming several bottles of Red Horse Grande, “AAA” and Randy, heavily intoxicated, decided to spend the night at Caga’s house.
- “AAA,” vomiting multiple times, fell asleep beside Caga, who had also passed out on a foam cushion.

2. **Alleged Assault:**

- While still intoxicated and asleep, “AAA” felt someone kiss her vagina, initially thinking it was her boyfriend.
- She tried to push the person away but failed. The perpetrator mounted her and inserted his penis into her vagina.
- Discovering it was Caga, “AAA” became hysterical, assaulted Caga, and kicked Randy awake, accusing him of neglect.

3. **Aftermath and Legal Proceedings:**

- “AAA” immediately reported the incident to the Barangay Hall and Police Station. Medical examination showed physical injuries indicative of sexual assault.
- Caga was confronted by Barangay Kagawad Aquino and admitted the rape allegation, which he also admitted at the police station.

4. **Procedural History:**

- At trial, “AAA” and witnesses testified against Caga, detailing the events.
- Caga’s defense was denial, claiming he did not commit any misconduct and attributing “AAA’s” accusations to hysteria due to intoxication.
- RTC found Caga guilty of rape, sentencing him to reclusion perpetua and ordering payment of moral damages to “AAA.”
- On appeal, the CA affirmed the RTC’s decision, dismissing Caga’s claims of incredible testimony and uncorroborated evidence. Caga’s subsequent motion for reconsideration was denied, leading to the appeal to the Supreme Court.

Issues:

1. Whether the evidence presented was sufficient to establish beyond reasonable doubt that

Caga committed rape.

2. Whether the lack of force, intimidation, or threat in the Information affects the validity of Caga's conviction.
3. The credibility of the victim's testimony and the corroborative evidence.
4. Appropriate damages to be awarded to the victim.

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

1. ****Sufficiency of Evidence:****

- The Supreme Court affirmed that the evidence clearly established beyond reasonable doubt that Caga had carnal knowledge of "AAA" while she was unconscious due to intoxication.

2. ****Legal Framework:****

- The court elucidated that rape under Article 266-A of the Revised Penal Code is committed not only by the use of force but also when the victim is deprived of reason or is unconscious.

3. ****Credibility of the Testimony:****

- The Court emphasized the importance of the victim's consistent and credible testimony, supported by physical evidence indicating sexual assault, and that lack of improper motive on the victim's part validated her credibility.

4. ****Assessment of Damages:****

- The Court increased the moral damages from P50,000.00 to P75,000.00, added civil indemnity and exemplary damages set at P75,000.00 each, and imposed interest at 6% per annum on all awarded damages from the finality of the decision until fully paid.

****Doctrine:****

- Rape can be committed where the victim is unconscious or unable to render valid consent due to intoxication or any similar condition, as per Article 266-A of the Revised Penal Code.
- Victims' credible testimonies, corroborated by physical evidence and immediate reporting, hold significant weight in rape convictions.

****Class Notes:****

- ****Elements of Rape (Article 266-A, Revised Penal Code):**** Consummation by (1) force, threat, or intimidation; (2) victim unconscious or deprived of reason; (3) fraudulent machination or grave abuse of authority; (4) victim under twelve or demented.
- ****Credibility Assessment:**** Victim's testimony substantiated by prompt reporting and

physical examination crucially supports rape allegations.

- **Damages in Rape Cases:** Moral damages, civil indemnity, and exemplary damages updated per current jurisprudence include interest from decision finality.

Historical Background:

- The case reinforces judicial sensitivity towards rape victims and underscores the severity with which Philippine law views rape, beyond mere physical coercion, including capacity to consent, aligning with broader human rights standards for the protection of vulnerable individuals.