

Title: People of the Philippines vs. Rodelio Gozum

Facts:

On the evening of November 11, 1974, Gloria P. Buna, a 14-year-old housemaid, was sleeping with Rodelio Gozum's child in the bedroom of his residence at 425 Gomezville Street, Mandaluyong, Metro Manila. Gozum's common-law wife was out of the house at the time. Gloria was awakened when Gozum, 36, positioned himself on top of her, covered her mouth, removed her underwear, and despite her resistance, forcefully engaged in sexual intercourse with her. Gloria's pink dress was torn during the assault.

Gozum's wife, Lourdes, discovered him in the bedroom with Gloria and confronted him, at which point Gloria ran out of the house and reported the rape to the Mandaluyong police the same evening. Lourdes subsequently went to the police station and begged Gloria to forgive Gozum, but Gloria refused. Upon the filing of the rape complaint, Gozum offered Gloria P500, which she again refused.

Gloria underwent a medical examination by the National Bureau of Investigation's medico-legal officer on February 6, 1975. Examination revealed her labia majora and minora were gaping, her hymen had a healed deep laceration, and her hymenal orifice admitted a tube of 2.8 centimeters in diameter, indicating she was no longer a virgin.

The trial court noted Gloria's emotional demeanor during her uncontrollable crying when she testified. Observing her unsophisticated and shy characteristics, the court found her testimony believable and concluded that she could not have fabricated her account.

Gozum testified in his defense that he did nothing to Gloria, arguing that the open door and lights on in the house made the rape improbable. He suggested his wife Lourdes tore Gloria's dress.

Procedural Posture:

Gozum was convicted of simple rape by the Court of First Instance of Rizal, sentenced to reclusion perpetua, and ordered to pay an indemnity of P35,000 to Gloria. Gozum appealed the decision, contending the prosecution's version was incredible and fraught with inconsistencies, ultimately challenging whether his guilt was proven beyond reasonable doubt.

Issues:

1. Whether the prosecution's evidence was credible and sufficient to prove Gozum's guilt

beyond reasonable doubt.

2. Whether minor inconsistencies in Gloria's testimony undermined her credibility.
3. Whether the absence of pregnancy affected the determination of the occurrence of rape.
4. Whether the trial court erred in its appreciation of the evidence presented.

Court's Decision:

The Supreme Court affirmed the trial court's decision, holding that Gozum's guilt for simple rape was proven beyond reasonable doubt.

1. Credibility and Sufficiency of Evidence:

The Court found the prosecution's evidence credible, noting the immediate and consistent complaint made by Gloria to the police and her rejection of compromise offers. The medico-legal findings corroborated her claim of rape.

2. Minor Inconsistencies:

The Court dismissed the minor inconsistencies in Gloria's testimony as expected given her age and inexperience with public trials, relying on precedent (*People vs. Limbo*) to emphasize that such inconsistencies do not destroy credibility.

3. Absence of Pregnancy:

The Court ruled that the fact Gloria did not become pregnant did not negate the occurrence of rape. The medico-legal officer's findings that Gloria had lost her virginity validated the rape claim.

4. Evidentiary Appreciation:

The Supreme Court agreed with the trial court's assessment of the evidence, emphasizing Gozum's opportunity and motive, given the circumstances of him being alone with Gloria.

Doctrine:

The doctrines reiterated in this case are:

1. The credibility of a rape victim's testimony, especially a minor, is given substantial weight, and minor inconsistencies do not undermine it.
2. The absence of pregnancy does not disprove the commission of rape.
3. Immediate reporting of the crime and rejection of compromise offers bolster the credibility of the victim's account.

Class Notes:

Key elements in rape cases:

1. Carnal knowledge by force or intimidation.
2. The credibility of the victim's testimony.
3. Corroboration by medical evidence.

Relevant statutes:

- Article 335 of the Revised Penal Code (as it was before Republic Act No. 8353) defining and penalizing rape.

Application/Interpretation:

- The Court emphasizes the weight of immediate complaint and credible medical corroboration.
- Consistency in the victim's behavior post-crime reinforces the testimonial credibility.

Historical Background:

During the 1970s in the Philippines, societal dynamics included significant power imbalances between employers and housemaids, influenced by socio-economic disparities. This case reflects the legal system's approach to addressing and rectifying such abuses of power and ensuring justice for vulnerable populations despite potential societal pressures to settle or compromise.