

****Title:****

People of the Philippines vs. ZZZ

****Facts:****

On November 26, 2008, ZZZ was charged with three counts of rape, committed against his stepdaughter AAA, under Article 266-A, Paragraph 1(a) of the Revised Penal Code (RPC), in relation to Republic Act No. 7610. AAA reported that ZZZ began molesting her when she was 10 years old, with incidents occurring as often as every night whenever her mother was not at home. ZZZ's assaults continued until AAA was 16 years old. The prosecution's case was based on AAA's testimony and the medico-legal findings of Dr. Merle P. Tan.

During the procedural journey, despite AAA filing an affidavit of desistance upon her mother's urging, the case proceeded to arraignment where ZZZ pleaded not guilty. During the trial, AAA recounted the repeated sexual abuse, corroborated by Dr. Tan's findings. The RTC Branch 90 of Cavite convicted ZZZ and sentenced him to reclusion perpetua for each count of rape. ZZZ appealed to the Court of Appeals (CA), which affirmed the RTC's decision but deleted the exemplary damages awarded due to the absence of aggravating circumstances.

Dissatisfied, ZZZ elevated the case to the Supreme Court, maintaining his plea of innocence through denial, alibi, and claims of being a strict parental figure disfavored by AAA.

****Issues:****

1. Whether ZZZ's guilt for the crimes was proven beyond reasonable doubt.
2. The correctness of the crime's designation and the corresponding penalties.
3. Appropriateness of the damages awarded to AAA.

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

1. ****Guilt Beyond Reasonable Doubt:****

- The Supreme Court upheld the conviction by affirming the credibility of AAA's testimony, which detailed ZZZ's repeated rape incidents. The Court emphasized that consistent and categorical testimony of a rape victim holds substantial weight. Additionally, Dr. Tan's medico-legal report, showing evidence suggestive of blunt force trauma, supported AAA's claims.

2. **Designation of the Crimes:**

- The Supreme Court corrected the designation of the crimes. ZZZ's acts when AAA was 15 and 16 years old were punished under Article 266-A, Paragraph 1(a) of the RPC. For the acts committed when AAA was below 12, the crime constituted statutory rape under Article 266-A, Paragraph 1(d) of the RPC. The penalties of reclusion perpetua imposed by the courts below were affirmed.

3. **Damages Award:**

- The Supreme Court modified the award of damages, increasing moral and civil indemnities from PHP 50,000 to PHP 75,000 for each count and reinstated exemplary damages of PHP 75,000 per count. Additionally, all amounts were subjected to six percent annual interest from the finality of the judgment until full payment.

Doctrine:

- **Credibility of Direct Testimony:** A rape victim's consistent and detailed narrative, particularly under detailed cross-examination, is sufficiently compelling evidence to establish guilt beyond reasonable doubt.

- **Correction of Legal Designation:** The Supreme Court emphasized proper crime designation per the Revised Penal Code, distinguishing between non-statutory rape and statutory rape.

- **Awarding Damages Consistently with Jurisprudence:** The Supreme Court underscores adjustments in damages and interest impositions in align with updated jurisprudence, promoting fair restitution.

Class Notes:

1. **Elements of Rape (Under Article 266-A RPC):**

- Carnal knowledge of a woman;
- Through force, threat, or intimidation;
- Victim under twelve years of age or demented (for statutory rape).

Statutory Provisions:

- **Article 266-A, Paragraph 1(a):** Rape by force, threat, or intimidation.
- **Article 266-A, Paragraph 1(d):** Rape when the victim is under twelve years old.

Application: In this case, AAA's testimony and medico-legal evidence demonstrated force and intimidation (Paragraph 1(a)) and marked AAA's age under twelve at the time of initial

assaults (Paragraph 1(d)).

2. **Damage Awards in Rape Cases:**

- Civil Indemnity: PHP 75,000.
- Moral Damages: PHP 75,000.
- Exemplary Damages: PHP 75,000.
- Interest: 6% per annum from judgment finality until full payment.

Historical Background:

This case fits into the broader context of legal reforms in the Philippines to enhance the protection of children against sexual abuse. Republic Act No. 7610 and Republic Act No. 8353 signify legislative efforts to fortify the legal regime against child abuse and equitable penalties for sexual offenses, resonating the global prioritization of child rights and welfare. The complexities of this case also highlight ongoing judicial efforts to refine procedural and substantive justice for heinous crimes like rape.