

### Title: People of the Philippines vs. XXX

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### Facts:

**\*\*Phase 1: Initial Assault and Pregnant Result\*\***

1. **\*\*November 2008:\*\*** AAA, a 29-year-old woman with a mental age of a six-year-old, confesses to her mother, BBB, that she is pregnant and names XXX as the father.
2. BBB and AAA's father confront XXX at the barangay, where he expresses willingness to marry AAA but the marriage does not ensue due to AAA's father's anger. XXX promises to support the child.
3. AAA gives birth to a baby girl.

**\*\*Phase 2: Subsequent Incident\*\***

4. **\*\*April 13, 2013:\*\*** While pasturing a cow, AAA is dragged into the shrubs by XXX, who then removes her underwear, covers her mouth, and rapes her. AAA resists by hitting him with a piece of wood and a stone.
5. AAA discloses the repeated sexual abuses by XXX, accompanied by threats to kill her if she disclosed the incidents to her mother.

**\*\*Procedural Posture:\*\***

1. **\*\*Charges Filed:\*\*** XXX is charged with Rape under Article 266-A, paragraph 1(d) of the Revised Penal Code and Sexual Abuse under Section 5(b) of Republic Act No. 7610.
2. **\*\*Regional Trial Court (RTC) Ruling (July 4, 2016):\*\*** The RTC finds XXX guilty beyond reasonable doubt of the crime of Rape but acquits him of the Sexual Abuse charge.
3. **\*\*Court of Appeals (CA) Ruling (June 29, 2018):\*\*** The CA affirms the RTC's decision finding XXX guilty of Rape with modifications to the damages awarded.
4. **\*\*Appeal to Supreme Court:\*\*** XXX appeals on grounds that AAA consented to sexual intercourse and that AAA was not mentally retarded.

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### Issues:

1. **\*\*Whether the Prosecution Proved Beyond Reasonable Doubt that XXX Committed Rape Against AAA.\*\***
2. **\*\*Whether AAA's Mental Disability Was Sufficiently Proven.\*\***

3. **Whether XXX's Knowledge of AAA's Mental Disability Qualifies the Crime as Rape or Statutory Rape.**

4. **Appropriate Penalty and Damages.**

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### ### Court's Decision:

#### **Issue 1: Proof Beyond Reasonable Doubt**

- **Resolution:** The Court affirms the conviction, finding that the prosecution established beyond reasonable doubt that XXX had carnal knowledge of AAA. XXX's admission of sexual intercourse and unsubstantiated "sweetheart" theory were insufficient defenses.

#### **Issue 2: AAA's Mental Disability**

- **Resolution:** The Court ruled that AAA's mental disability was proven through expert testimony and assessments, concluding that her chronological age was 29, but her mental age was that of a six-year-old.

#### **Issue 3: Nature of the Crime**

- **Resolution:** The Court found that all elements of statutory rape were proven, considering AAA's mental incapacity to give rational consent. However, it ruled that there was insufficient evidence to prove that XXX knew of AAA's mental disability at the time of the crime, thus qualifying the crime as statutory rape, rather than under the qualified form of rape that warrants harsher punishment like the death penalty.

#### **Issue 4: Penalty and Damages**

- **Resolution:** The RTC's imposition of reclusion perpetua without parole was clarified per existing guidelines. The damages were modified to conform to current jurisprudence, awarding AAA civil indemnity of P75,000, moral damages of P75,000, and exemplary damages of P75,000, all accruing interest at 6% per annum from the finality of the decision until fully paid.

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### ### Doctrine:

- **Statutory Rape:** The determining criterion is either the chronological age or the mental age, especially where mental disability is proven. Consent is immaterial when the victim lacks the mental capacity to give rational consent.

- **Qualification Elements:** Qualifying circumstances must be sufficiently alleged and

proven for penalties beyond the ordinary reclusion perpetua to apply, substantiating knowledge of the victim's mental state by the offender at the time of the crime.

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### ### Class Notes:

- **Key Legal Elements:**
- **Statutory Rape:** Proving age/mental age, carnal knowledge.
- **Rape of Mental Retardate:** Proof of mental age, carnal knowledge, offender's awareness of victim's mental state.
- **Admissibility of Expert Testimony:** Psychological evaluations are crucial.
  
- **Statutory Provisions:**
- **Article 266-A, paragraph 1(d) of the Revised Penal Code (RPC):** Rape of a mentally impaired person.
- **RA No. 7610 (Child Protection Law):** Further protective measures against abuse.
- **People v. Castillo Doctrine:** Defines the application of mental age in statutory rape cases.
- **Article 266-B of the RPC:** Qualification factors for a higher penalty.

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### ### Historical Background:

- **Rape Law Evolution:** The case contextualizes the interpretation shifts in how statutory rape is viewed concerning victims with mental disabilities, reinforcing the need to consider mental age over chronological age.
- **Framework for Sexual Abuse Cases:** Highlights procedural and substantive requirements in safeguarding vulnerable individuals, emphasizing evolving protective laws and judicial outlooks in handling sexually explicit crimes against mentally impaired persons.