

### Title: People of the Philippines vs. Carlos Bonghanoy

### Facts:

- **July 26, 1994:** An information for rape was filed by the Asst. Provincial Prosecutor on behalf of Baby Jane de Guzman y Bonghanoy, a minor aged 14, against Carlos Bonghanoy y Agrabiador, alleging that on June 28, 1994, in San Jose del Monte, Bulacan:
  - **Incident:** Bonghanoy allegedly raped Baby Jane by force, threats, and intimidation.
  - **Context:** Baby Jane is Bonghanoy's niece, and she was forced to accompany him on an errand by deceit.
  - **June 28, 1994, 7 p.m.:** Bonghanoy asked permission from Baby Jane's parents for her brother Jovy to accompany him, but ended up taking Baby Jane instead.
  - **Events:**
    - They went to several locations looking for Bonghanoy's wife.
    - At San Jose Elementary School, Bonghanoy dragged Baby Jane into the compound, threatened her with a rock, forced her to strip, and raped her.
    - The incident lasted until 11 p.m. when they returned home.
  - **Next Morning:** Baby Jane disclosed the rape to her mother. They reported the incident to the police and underwent a medical exam revealing significant injuries consistent with rape.
  - **Defense:** Bonghanoy claimed he was in a drinking spree with friends from 5 p.m. to midnight and presented Balvino Alingas as his alibi witness.
  - **March 14, 1996:** The trial court found Bonghanoy guilty of rape and sentenced him to death, based on the Heinous Crimes Law (Republic Act No. 7659) due to the victim's age and their familial relationship.
  - **Procedural Posture:** The case was elevated to the Supreme Court for automatic review due to the death penalty's imposition.

### Issues:

1. **Credibility of Witnesses:**
  - Did the trial court err in not giving credence to the testimonies of defense witnesses?
2. **Crime Information:**
  - Did the information filed err by not alleging the familial relationship and the victim's age as elements of the offense?
3. **Victim's Age:**
  - Was there sufficient evidence to establish Baby Jane's age?
4. **Trial Court Decision:**

- Did the trial court fail to meet the constitutional requirement for clarity and distinctness in stating the facts and laws on which its decision was based?

### ### Court's Decision:

#### #### \*\*Credibility of Witnesses:\*\*

- **Court's Analysis:** Held Baby Jane's testimony credible, as it was direct, positive, and categorical, consistent with human nature and regular conduct of events.

- **Conclusion:** The trial court did not err in its credibility assessment. The victim's unwavering assertion during cross-examination reinforced her credibility.

#### #### \*\*Crime Information:\*\*

- **Court's Analysis:** Alleging relationship and age in the information was necessary for qualifying the crime to include the death penalty under the Heinous Crimes Law.

- **Conclusion:** The information lacked specific allegations regarding these qualifying factors. Thus, Bonghanoy could be convicted only of simple rape, not qualified rape.

#### #### \*\*Victim's Age:\*\*

- **Court's Analysis:** This issue was rendered moot since the judgment for qualified rape was already dismissed due to the faulty information.

- **Conclusion:** The age aspect was not determinative for imposing the death penalty because the relationship element was not pleaded.

#### #### \*\*Trial Court Decision:\*\*

- **Court's Analysis:** Despite noted shortcomings in clarity, the lower court adequately detailed the evidence and legal reasoning.

- **Conclusion:** The decision met constitutional requirements, though improvements were suggested.

### ### Doctrine:

- **Qualifying Circumstances in Rape:** For the death penalty to apply, qualifying circumstances such as the victim's age and relationship with the accused must be explicitly alleged in the information.

- **Credibility of Rape Victim:** Convictions can be based solely on the victim's testimony if credible, consistent, and natural.

- **People v. Ramos:** Qualifying circumstances must be precisely pleaded and proved to adjust the degree of the penalty.

### ### Class Notes:

- **Key Elements of Rape:**

1. Carnal knowledge of a woman.
2. Accomplished by force or intimidation.
3. Victim did not consent.
4. Can be corroborated by credible victim testimony alone if consistent.

- **Republic Act No. 7659 & Article 335:** Qualifying circumstances must be explicitly stated in the charging document.

- **Constitutional Mandate:** Detailed and distinct articulation of facts and laws in judicial decisions is constitutionally required.

**Historical Background:**

- **Republic Act No. 7659, known as the Heinous Crimes Law:** Enacted to intensify penalties for grievous crimes like rape, specifically when aggravating elements, such as victim's minority or familial relation, are present.

- **Context:** This case exemplifies the application of stringent standards imposed by RA 7659, necessitating precision in charge sheets to ensure that enhanced penalties like the death penalty adhere to the due process requirements.