

Title: People of the Philippines vs. Anthony Mabalo y Bacani

Facts:

On June 24, 2008, at around 12:30 a.m., Anthony Mabalo y Bacani returned to the two-story house where he lived with private complainant, AAA, who was then 14 years old, among others. Mabalo's wife had left him two days prior after a quarrel. Around 2:30 a.m., while AAA was watching television alone in the living room, Mabalo emerged from his room, approached AAA, and held her right thigh. He then pushed AAA to a lying position on the floor, covered her mouth with his left hand, and pulled down his pants and underwear. Mabalo lifted his hips, opened AAA's legs, and inserted his penis into her vagina, making two pumping motions before ejaculating. AAA attempted to resist but was too weak due to her asthma. Mabalo threatened AAA not to disclose the incident to anyone.

Later that day, AAA told her mother about the incident, and they reported it to the police. AAA underwent a medico-legal examination, which revealed blunt force trauma indicative of penetration. Mabalo was subsequently arrested, and an Information charging him with rape in relation to R.A. No. 7610 was filed.

During his arraignment, without counsel, Mabalo pleaded not guilty. The prosecution presented testimonies from AAA, police officers, and the examining doctor. Mabalo denied the allegations, claiming he was selling goods with his relatives at the time of the incident.

Procedural Posture:

The Regional Trial Court (RTC) found Mabalo guilty beyond reasonable doubt of rape in relation to R.A. No. 7610 and sentenced him to reclusion perpetua, along with ordering him to pay civil, moral, and exemplary damages totaling PHP 225,000, plus interest.

Mabalo appealed the decision to the Court of Appeals (CA), arguing the incredibility of AAA's testimony, lack of force or intimidation, absence of spermatozoa, and failure to establish AAA's minority. The CA affirmed the RTC's conviction, finding Mabalo guilty beyond reasonable doubt of Simple Rape.

Issues:

1. Whether AAA's testimony was credible.
2. Whether there was sufficient evidence of force, threat, or intimidation.
3. Whether the absence of spermatozoa affected the finding of guilt.
4. Whether the prosecution sufficiently established AAA's age.

Court's Decision:

The Supreme Court affirmed the CA's decision, addressing each issue accordingly:

1. **Credibility of AAA's Testimony:**

- The Court found AAA's testimony consistent and unwavering. Despite the difficulties in proving rape, the lone testimony of the victim, if credible, is sufficient for a conviction. AAA's detailed account of the assault met this standard, and she had no motive to falsely accuse Mabalo.

2. **Evidence of Force, Threat, or Intimidation:**

- The Court found that Mabalo used significant force and intimidation by covering AAA's mouth, pushing her to the floor, and overpowering her physically. AAA's struggle and the accompanying physical trauma validated her account of non-consensual intercourse.

3. **Absence of Spermatozoa:**

- The Court ruled that the presence or absence of spermatozoa is not a necessary element in proving rape. The medico-legal findings of blunt force trauma supported the claim of penetration, corroborating AAA's testimony.

4. **Establishment of AAA's Age:**

- The Court acknowledged the prosecution's failure to provide a birth certificate or other authentic documents proving AAA was under 18. Accordingly, the Court agreed with the CA's classification of the crime as Simple Rape under Article 266-A (1)(a) of the Revised Penal Code, as opposed to rape in relation to R.A. No. 7610.

Doctrine:

- **Simple Rape under Article 266-A:** The crime is committed by carnal knowledge of a woman through force, threat, or intimidation.

- **Evidence Requirements:** A single, coherent testimony of the victim can be sufficient for a conviction, supported by corroborative evidence such as medical findings.

- **Force and Intimidation:** Physical overpowering and covering the mouth are considered sufficient forms of force to establish rape.

- **Age Verification In Rape Cases:** If necessary documentation is unavailable, credible testimony or judicial notice of age within statutory guidelines is required to classify the offense accurately.

Class Notes:

- **Rape under RPC Article 266-A (1)(a):** Essential elements include carnal knowledge

through force, threat, or intimidation.

- **\*\*Key Principles:\*\***

- Victim's credible testimony stands alone for conviction.
- Medical evidence serves corroboration, not a necessity for establishing rape.
- Victim's minority must be proven through official documents or credible testimony by knowledgeable persons.

**\*\*Relevant Statutory Provisions:\*\***

- Article 266-A, Revised Penal Code.
- Republic Act No. 8353 and Republic Act No. 7610 for crimes involving minors.

Historical Background:

- The case illuminated the application of legal principles on rape, especially under differing statutes like the Revised Penal Code and R.A. No. 7610. The judicial emphasis on credible witness testimony and the supplementary role of medical evidence has fortified the approach to rape prosecutions in Philippine jurisprudence. The case underscores the critical need for procedural diligence in proving victim age to ensure accurate offense classification.