

****Title:**** People of the Philippines vs. Vicente Valla, G.R. No. 113471

****Facts:****

On April 14, 1991, around nine in the morning, 12-year-old Myra Pines was passing by a ricefield in Barangay Ilayang Tayuman, San Francisco, Quezon, carrying bananas. She heard what seemed to be strangling sounds from a forested area, recognized the voice as that of her 8-year-old friend, Dyesebel “Gigi” de la Cruz, became scared, and rushed home after fulfilling her errand.

At 4:00 PM the same day, Barangay Captain Aristeo Allarey of Barangay Ilayang Tayuman was informed by Mila de la Cruz, Dyesebel’s mother, that her daughter was missing. Allarey organized a search party comprising members of Sangguniang Barangay, a Barangay Tanod, Dyesebel’s father Gonzalo de la Cruz, and local residents, including prosecution witnesses Bayani Samadan and Reynaldo Merle.

Gonzalo de la Cruz informed Allarey that Dyesebel had been with accused-appellant Vicente Valla earlier, tasked with watching a ricefield. However, they found Valla drinking in a friend’s house in the barangay. Allarey summoned him, but Valla did not immediately respond.

The search continued until 6:30 PM without success. The next day, at around 11:00 AM, the search party found Dyesebel’s body near a riverbank with signs of strangulation and sexual assault. Valla, following the search party, admitted on the spot that he raped and killed Dyesebel and begging forgiveness.

Valla was arrested and taken to the police headquarters. An autopsy revealed multiple severe injuries, including skull fractures, cigarette burns, and extensive sexual assault.

Valla was charged with “rape with murder” on August 14, 1990, he pleaded not guilty. During trial, the prosecution presented several witnesses who testified to hearing the victim, discovering the body, and witnessing Valla’s confession. Valla’s defense was an alibi that he was home caring for his sick child, supported by testimony from his father but contradicted on critical points.

The Regional Trial Court of Gumaca, Quezon, convicted Valla of “rape with homicide,” sentencing him to reclusion perpetua, ordering him to pay the victim’s heirs P50,000 as indemnity and P30,000 as actual and moral damages.

****Issues:****

1. Did the trial court err in giving full weight and credence to the prosecution witnesses' testimonies despite alleged inconsistencies?
2. Did the trial court err in finding the accused guilty beyond a reasonable doubt?

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

1. ****Credibility of Witnesses:****

- The Supreme Court found that alleged inconsistencies in the testimonies of prosecution witnesses Aristeo Allarey and Reynaldo Merle were on minor points that did not affect the material aspects of the case. The testimonies were consistent on material points relevant to the crime.
- The Court emphasized the principle that trial judges' evaluation of witness testimony is given the highest respect due to their direct opportunity to observe the demeanor of the witnesses.

2. ****Guilt Beyond Reasonable Doubt:****

- Valla's extrajudicial confession corroborated by the finding of the victim's body and the medico-legal evidence satisfied the requirement for the corpus delicti.
- The Court admitted additional uttered statements of Valla as part of the res gestae since they were made immediately after the startling event of finding the victim's body.
- Valla's defense of alibi was weak, as his house was within the same barangay, making it feasible for him to be at both locations.

****Doctrine:****

- ****Extrajudicial Confession:**** Establishes that an extrajudicial confession corroborated by the corpus delicti is admissible and sufficient for conviction if it meets the requirements of Section 33 of Rule 130 and Section 3 of Rule 133 of the Revised Rules of Court.
- ****Res Gestae:**** Allowing spontaneous declarations immediately following startling events to be admissible, promoting the reliability of statements made without time for fabrication.
- ****Alibi:**** An alibi defense must clearly show the physical impossibility of the accused being at the crime scene.

****Class Notes:****

1. ****Elements of Rape with Homicide (Art. 335, Revised Penal Code):****
 - Carnal knowledge with violence or intimidation
 - Resulting homicide
2. ****Doctrine on Minor Inconsistencies:****

- Inconsistencies on trivial details do not affect credibility if the principal elements and testimonies regarding the crime are consistent.

3. **Corpus Delicti in Criminal Law:**

- Must show some substantial evidence independent of the confession that a crime occurred. It does not require proof of every element beyond the confession.

Historical Background:

- Reflecting the contextual and societal views on violent crimes against minors, setting a precedent on dealing with heinous crimes and extrajudicial admissions.

- The case underscores the Philippine judiciary's commitment to protecting minors and ensuring that justice is served even amid procedural intricacies.