

****Title****: People of the Philippines vs. Armando Tagud, Sr.

****Facts****:

On May 23, 1998, AAA, employed as a house helper, returned to her family home for her birthday. That evening, her father, Armando Tagud, Sr., ordered her to lie face down, stepped on her back, forcibly undressed her, and raped her. AAA's brother, CCC, witness to the act, was told by Tagud to leave. When AAA's mother, BBB, returned later, AAA informed her of the rape, but BBB felt helpless out of fear. Later, AAA reported the incident to her employer, who then accompanied her to the Department of Social Welfare and Development and the National Bureau of Investigation. On July 9, 1998, Dr. Labanon conducted a medical examination on AAA, revealing hymenal lacerations and other signs consistent with repeated sexual abuse.

Procedurally, Tagud initially pleaded guilty, hoping for a lesser penalty, but was advised by the court to plead not guilty. Eventually, he re-entered a plea of guilty, fully aware of the severe consequences. Even with his plea, the court proceeded to trial to fully establish the evidence and degree of culpability.

****Issues****:

1. Whether the trial court erred in finding Armando Tagud, Sr. guilty of rape beyond a reasonable doubt.
2. Whether the death penalty was appropriately imposed despite the prosecution not specifying the exact age of the victim in the Information.

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

1. ****Guilt Beyond Reasonable Doubt****: The Supreme Court upheld the trial court's finding of guilt for rape based on credible and consistent testimony from AAA, corroborated by medical findings. The Court dismissed Tagud's arguments questioning AAA's credibility and his claim of misleading plea consequences.
2. ****Imposition of Death Penalty****: The Court reduced Tagud's penalty from death to reclusion perpetua. The Information did not specifically allege AAA's exact age, which is crucial for imposing the death penalty. As per the Revised Rules of Criminal Procedure and established jurisprudence, qualifying circumstances, like the victim's minority, must be explicitly stated in the Information for invoking the death penalty.

****Doctrine****:

- ****Strict Compliance in Capital Cases****: In crimes punishable by death, Information must

precisely allege qualifying circumstances, especially the exact age of the victim when such minor status enhances the crime's penalty.

- ****Single Indivisible Penalty Application****: When a law prescribes a single indivisible penalty, it must be imposed regardless of mitigating or aggravating circumstances.

****Class Notes****:

- ****Qualified Rape Elements****: Relationship to the victim, minority of the victim, force or threat of force.

- ****Revised Penal Code****: Article 266-A (defining rape) and Article 266-B (penalties, including mandatory qualifications for death).

- ****Revised Rules of Criminal Procedure****: Sections 8 and 9, Rule 110 (requiring the accurate allegation of qualifying/aggravating circumstances).

****Historical Background****:

This case highlights judicial rigor concerning capital punishment cases, particularly ensuring defendants are fully aware and adequately informed of the charges, qualifying circumstances, and possible penalties. It aligns with reforms promoting due process and just application of severe penalties by mandating precise charges and proof requirements, reflecting advances in legal standards for human rights and procedural fairness.