

Title:

****People of the Philippines v. Norieto Monroyo y Mahaguay****

Facts:

Series of Events:

1. ****August 24, 2003****: AAA, a 14-year-old girl, was alone at home when her uncle, Norieto Monroyo, arrived. He approached her and touched her private parts. He warned her not to tell anyone.
2. ****October 13, 2003****: Monroyo went to AAA's house to ask for cigarettes while she was cleaning. He followed her to the living room and again touched her private parts.
3. ****October 15, 2003****: AAA visited Monroyo's house in search of her cousin, Norton. When she discovered Norton was not at home and attempted to leave, Monroyo touched her private parts again.
4. ****November 18, 2003****: BBB, a 16-year-old girl, was sleeping with her siblings when she awoke at 11 p.m. to find Monroyo groping her. He forced her to lie on the floor, kissed her, removed her clothing, and raped her under threats.

Procedural History:

- ****October 13, 2004****: Four Informations were filed against Monroyo in the RTC, charging him with three counts of Acts of Lasciviousness against AAA and one count of Qualified Rape against BBB.
- ****RTC Ruling (November 16, 2011)****:
 - Found Monroyo guilty of three counts of Acts of Lasciviousness and Rape.
 - Sentenced for Acts of Lasciviousness: Two months and one day to four years and two months.
 - Sentenced for Rape: Reclusion perpetua.
 - Monetary awards were assigned for both cases as civil indemnity, moral, and exemplary damages.
- ****CA Ruling (May 27, 2015)****: Affirmed RTC's judgment.
- ****Appeal to Supreme Court****: Monroyo pursued remedies, arguing the trial courts erred in convicting him based on testimony credibility and evidentiary considerations.

Issues:

1. ****For Acts of Lasciviousness (AAA)****:
 - Whether the RTC and CA erred in convicting Monroyo for three counts based on AAA's testimony.
 - The proper classification of the offense under relevant statutory provisions.

2. **For Rape (BBB)**:

- Whether the testimonies and evidence sufficiently proved Monroyo's guilt beyond a reasonable doubt.
- Whether the qualifying circumstances of minority and relationship were appropriately considered.

Court's Decision:

Acts of Lasciviousness:

1. **Credibility & Sufficiency of Testimony**:

- The Court upheld AAA's detailed and credible testimony which was consistent and categorical in describing the acts of Monroyo.
- Acknowledged the contextual presence of force and intimidation inferred from Monroyo's relational ascendancy as AAA's uncle.

2. **Error in Information Designation**:

- The Court noted the wrongful designation of the crime but ruled the detailed facts in the charge formed the basis for conviction under Article 336 of the RPC in conjunction with Section 5(b) of RA 7610.
- Affirmed Monroyo's conviction coupling it with adjusted sentencing to reclusion temporal with appropriate civil liabilities.

Qualified Rape:

1. **Evaluation of Evidence**:

- The Court appreciated BBB's testimonial credibility and consistency corroborated by medical findings.
- Recognized BBB's courage despite threats and familial pressures.

2. **Qualifying Circumstances**:

- Corrected the RTC's oversight, confirming that the qualifying factors of minority and relationship (affinity within the 3rd degree) were alleged and verified.
- Adjusted Monroyo's conviction to Qualified Rape with a confirmed imposition of reclusion perpetua without eligibility for parole, alongside reinforced civil liabilities.

Interest Adjustment:

- Instituted a 6% p.a. interest rate on all monetary awards from judgment finality until fully paid.

Doctrine:

1. **Real Nature of Criminal Charges**:

- Crime determination relies on factual recital within Informations, not necessarily their denominational or statutory misplacement (People v. Bayona, 58 Phil. 430 (1933)).

2. **Credibility of Child Witness Testimonies**:

- Denial typically weaker than direct, positive testimonies particularly from young and decent victims unless further ill motivations are demonstrable.

Class Notes:

1. **Acts of Lasciviousness under RPC and RA 7610**:

- Elements: Lascivious acts using force or upon minors (<12 years).
- Relevant Articles: Article 336 RPC, Section 5(b) RA 7610.
- RA 7610: Focus on child abuse exploitation acts enhancing penalties.

2. **Qualified Rape under RPC**:

- Elements: Carnal knowledge via force, threat, involving minors with relational qualifications.
- Relevant Articles: Article 266-A and 266-B of the RPC, as amended by RA 8353.
- Defined penalties: Elevated to reclusion perpetua, non-eligibility for parole, and specific civil and exemplary damages reflective of prevailing jurisprudence (People v. Jugueta).

Historical Background:

- **Legislative Context**: The Anti-Rape Law (RA 8353) shifted rape to a crime against persons, refining definitions and penalties aligning with evolving juridical and societal norms on sexual violence.
- **Jurisprudence Evolution**: Enhanced protection for minors through RA 7610's emphasis on acts irrespective of specific designations expanding judicial consideration to broader facts of criminal conduct.

This case reinforces stringent scrutiny and protection against sexual abuses aligning Philippine jurisprudence with stringent statutory protections and evolving societal standards.