

## Title: People of the Philippines vs. XXX

### Facts:

On four distinct occasions in January 2012, XXX was accused of raping his 15-year-old daughter, AAA, using force, threats, and intimidation while armed with a bolo. The incidents occurred as follows:

1. **January 14, 2012, 11:00 AM (Criminal Case No. 6555)**: While alone at home with AAA, XXX ordered her siblings to the cornfield and then dragged AAA to the living room, where he forced himself on her.
2. **January 14, 2012, 3:00 PM (Criminal Case No. 6556)**: Later that day, the accused repeated the act in the same manner.
3. **January 18, 2012, 11:00 AM (Criminal Case No. 6557)**: XXX again assaulted AAA in their living room.
4. **January 21, 2012, 3:00 PM (Criminal Case No. 6558)**: XXX followed AAA to her grandmother's house on a mountain and assaulted her there.

AAA confided in her aunt and grandmother on January 31, 2012, and subsequently reported to the police. A medical examination by Dr. Jeremias T. Rebuena showed no physical signs of rape such as lacerations, but the medico-legal doctor explained that the nature of the rape described (inter labial sex) did not necessarily produce such evidence.

### Procedural Posture:

1. **RTC (March 13, 2014)**: Found XXX guilty of four counts of rape and sentenced him to reclusion perpetua without eligibility for parole, ordering him to pay damages.
2. **CA (September 16, 2015)**: Affirmed the RTC's judgment but modified the damages awarded.
3. **Supreme Court**: XXX appealed, challenging the credibility of AAA's testimony and the absence of physical evidence of rape.

### Issues:

1. **Credibility of the Victim's Testimony**: Is AAA's testimony credible given the circumstances and the lack of physical evidence?
2. **Consistency with Medical Findings**: Does the absence of physical injuries negate the occurrence of rape?
3. **Appropriate Nomenclature of Crime**: Should the crime be classified as "rape" or "qualified rape"?

### Court's Decision:

1. **Credibility of the Victim's Testimony**: The RTC's assessment of witness credibility is given great respect. AAA's clear, detailed, and consistent testimony was credible and reinforced by the behavior and conditions typical of a rape survivor.
2. **Consistency with Medical Findings**: Rape, as defined by law, includes the slightest penetration of the labia. The medical findings of an intact hymen are not inconsistent with rape, especially given the described inter labial sexual contact. Totally emphasizing that a full penile penetration is not necessary for rape to be consummated.
3. **Nomenclature of the Crime**: Considering the established facts, the Supreme Court deemed the crime to be "qualified rape" due to the factors of minority and parental relationship. The penalty of reclusion perpetua without eligibility for parole was found appropriate. The Court adjusted the awarded damages to align with current jurisprudence.

### Doctrine:

1. **Credibility of Witnesses**: Trial and appellate courts heavily rely on the trial court's observation of the witnesses' demeanor and credibility during testimony.
2. **Rape Definition**: The crime of rape is consummated by the slightest penetration of the labia, and an intact hymen does not preclude a rape finding.
3. **Qualified Rape**: The crime is classified as qualified rape when the victim is under 18 and the perpetrator is a parent.

### Class Notes:

- **Elements of Rape (Article 266-A and 266-B of the Revised Penal Code)**:
  1. Sexual intercourse
  2. With a woman
  3. Using force, threat, or intimidation
  4. Victim is under 18
  5. Offender is a parent
- **Key Jurisprudence**:
  - Supreme Court reiterates that the slightest penetration is sufficient to constitute rape.
  - Full penile penetration is unnecessary for consummation.
  - The presence or absence of physical signs of rape (like hymenal lacerations) does not determine the occurrence of rape.
  - Testimonies from credible, consistent, and detailed witness accounts, especially supported

by expert medical opinion, hold substantial evidentiary weight.

- **\*\*Statutes and Provisions\*\***:

- Revised Penal Code (Article 266-A and 266-B)
- Republic Act No. 9346 (Abolition of the Death Penalty)

**### Historical Background:**

This case reflects the ongoing societal and legal struggle to address and properly adjudicate cases of sexual abuse, particularly within the family unit. It underscores the need for legal frameworks sensitive to such heinous crimes' nuances and horror. The ruling reinforces the principle that justice systems must adapt corroborative mechanisms beyond physical evidence to provide protection and justice for vulnerable victims such as minors.