

Title: People of the Philippines vs. Amado Daniel alias “Amado Ato”

Facts:

1. **Initial Complaint:** On September 20, 1965, 14-year-old Margarita Paleng accused Amado Daniel of rape, alleging that he, armed with a sharp instrument, forcibly had carnal knowledge of her in her room in Baguio City.

2. **Procedural Posture:**

- The case was filed in the Court of First Instance (CFI) of Baguio City.
- Trial court’s Decision: On May 30, 1966, Judge Feliciano Belmonte found Daniel guilty and sentenced him to reclusion temporal ranging from 6 years and 1 day to 12 years and 1 day.
- Motion for Reconsideration: Daniel’s motion was denied.
- Appeal and Transfer to the Court of Appeals: Daniel appealed, and the case was forwarded to the Court of Appeals.

3. **Court of Appeals Decision:**

- On September 23, 1974, the Court of Appeals found Daniel’s guilt proven beyond reasonable doubt and noted that the appropriate penalty under Republic Act No. 4111 (which amended Article 335 of the Revised Penal Code) was reclusion perpetua.
- As mandated by Section 17 of the Judiciary Act of 1948, the Court of Appeals certified the case to the Supreme Court because it involved a crime punishable by life imprisonment or death.

4. **Supreme Court Certification:**

- The Supreme Court docketed the case and reviewed the procedural and merit-based aspects of the appeal.

Issues:

1. **Jurisdictional Issue:** Whether the Supreme Court holds jurisdiction over criminal appeals involving penalties of reclusion perpetua or death when the Court of Appeals certifies such cases without imposing these penalties.

2. **Credibility and Consistency:**

- The credibility of the victim’s testimony versus the accused’s defense of consensual sexual intercourse.
- Whether sufficient force or intimidation was used to constitute rape.

3. **Application of the Law:** Whether the penalty should be reclusion perpetua or death given the circumstances and the amended Article 335 of the Revised Penal Code.

Court’s Decision:

1. **On Jurisdiction:**

- The Supreme Court held that it has exclusive jurisdiction to review such cases, as per the constitutional appellate jurisdiction for criminal cases where the penalty imposed is death or life imprisonment.

- It was determined that the Court of Appeals was correct in certifying the case without imposing the death penalty but including findings that warranted such a penalty.

2. **Credibility of Testimony:**

- The Supreme Court found no reason to doubt Margarita's testimony, given her straightforward recounting of events and lack of motive to fabricate the incident.

- The evidence, including the medical findings of recent defloration and physical injuries consistent with forced intercourse, supported her claims.

3. **Sufficient Force:**

- The Court confirmed that the demonstrated force and intimidation used by Daniel were adequate to satisfy the legal definition of rape.

- The absence of physical injuries untangled with her resistance did not absolve the crime since intimidation and threat with a deadly weapon were proven.

4. **Penalty:**

- The Supreme Court affirmed the lower courts' decisions on Daniel's guilt but modified the sentence to reclusion perpetua in line with Republic Act No. 4111 and the absence of a qualifying vote for the death penalty.

- Daniel was also ordered to indemnify the victim with moral damages amounting to PHP 12,000 and to pay the costs.

Doctrine:

- **Jurisdictional Threshold:** The Supreme Court holds exclusive jurisdiction in criminal cases where the penalty could be death or reclusion perpetua, even if the Court of Appeals does not directly impose such a penalty but recommends it.

- **Rape Definition:** The force in rape cases must be sufficient to accomplish the act; intimidation and threat, especially with a deadly weapon and against a minor, solidify the crime irrespective of physical injury.

Class Notes:

- **Rape Elements:** Carnal knowledge, use of force or intimidation, against the victim's will.

- **Legal Statutes Applied:**

- **Article 335, Revised Penal Code** (as amended by Republic Act No. 4111): Rape punishable by reclusion perpetua or death if committed with a deadly weapon.

- **Section 17, Judiciary Act of 1948:** Supreme Court jurisdiction in death or life

imprisonment cases.

- **Procedural Insights:**

- **Victim Testimony's Weight:** Courts give weight to the victim's consistent and credible testimony.

- **Medical Corroboration:** Physical examination findings supporting the claims enhance credibility.

Historical Background:

This case contextualizes the legal and procedural norms surrounding rape cases in the Philippines in the 1960s and 1970s, highlighting the judicial processes for serious criminal cases affected by statutory and constitutional mandates. This decision re-emphasized the importance of the Supreme Court's role in final determinations of severe criminal penalties, streamlined by clear procedural mandates, amid evolving legislative frameworks and societal focus on protecting victims' rights and upholding legal sanctity in grave offenses like rape.