

**\*\*Title: People of the Philippines v. Lopez, 165 Phil. 803 (1977)\*\***

**\*\*Facts:\*\***

1. On January 14, 1972, complainant Salvacion Pablo, a 15-year-old girl, was alone in her house, sewing her shorts, with only panties and a blouse on. Defendant Ernesto Lopez, her first cousin, entered her room uninvited and sat near her.
2. Salvacion felt no immediate threat and did not ask Ernesto to leave. Without warning, Ernesto pushed her onto the bed, touched her breasts, removed his trousers, and then her panties, subsequently proceeding with sexual intercourse, which Salvacion claimed involved force.
3. Despite the alleged force, during cross-examination, Salvacion admitted both experienced sexual satisfaction.
4. After the encounter, neither demonstrated any signs of distress. Ernesto dressed up and left, as did Salvacion, who went on with her day without raising an immediate alarm or informing anyone, including her father or the authorities.
5. It wasn't until around May, when her pregnancy became apparent, that the incident was disclosed to her grandaunt, Leoncia Carreon. Salvacion was subsequently encouraged to marry Ernesto, but this was impeded by familial relations (being first cousins).
6. A complaint was lodged against Ernesto for rape, resulting in his conviction in the lower court, sentencing him to reclusion perpetua.
7. Ernesto appealed on the basis of the lack of evidence to support a guilty verdict beyond a reasonable doubt. The Solicitor General agreed, suggesting acquittal.

**\*\*Issues:\*\***

1. Whether the act of coition between Ernesto and Salvacion constituted rape under the circumstances described.
2. Whether the evidence presented by the prosecution sufficed to overcome the constitutional presumption of innocence granted to Ernesto Lopez.
3. Whether the behavior of both parties post-incident could negate the assertion of rape.

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

1. The Supreme Court reversed the lower court's decision, finding no sufficient basis for the conviction of rape due to a lack of persuasive evidence demonstrating force or lack of consent.
2. The Court held that the mere occurrence of coition in itself, even under dubious circumstances, does not satisfy the legal criteria for rape, especially with advice from the Solicitor General that the prosecution's case did not meet the burden of proof required for criminal conviction.
3. The acquittal was fueled by several factors, including Salvador's delayed disclosure of the incident, an absence of physical evidence corroborating force or violence, and the atypical demeanor of Salvacion after the alleged incident.

**\*\*Doctrine:\*\***

- The presumption of innocence is fundamental, and the burden rests heavily on the prosecution to establish guilt beyond a reasonable doubt. Mere conjecture or assumptions about force or non-consent do not meet the requisite standard for a rape conviction.

**\*\*Class Notes:\*\***

- Elements of Rape: Carnal knowledge of a woman under specific circumstances, such as through force, intimidation, or when the victim is incapacitated.
- Presumption of Innocence: Enshrined in Article IV, Section 19 of the Constitution, this protects defendants from wrongful conviction when doubt exists.
- The necessity of corroborating evidence in proving rape due to its nature usually precluding eyewitness testimony.

**\*\*Historical Background:\*\***

- The case was decided within the context of evolving mores and the Philippine legal framework's strict adherence to evidence-based adjudication, showcasing the judiciary's commitment to protecting individual rights against social and moral biases reflected in legal proceedings related to sensitive cases of sexual offenses.