

****Title:**** People of the Philippines v. Miguel Lucban Servo

****Facts:****

On February 3, 1990, Nenita G. Bentabal, aged 15, was at home in Antipolo, Rizal, with her sister, Girlie, 7, while their mother was away in Manila. Their stepfather, Miguel Lucban Servo, arrived late, and upon entering, he forcibly pulled Nenita to bed, threatened her with a knife, tied her hands, and raped her. Girlie, awakened during the incident, witnessed it briefly before going back to sleep. Miguel threatened Nenita not to tell anyone about the rape, warning that he would kill her and her mother.

The following day, Nenita disclosed the incident to her mother, Corazon G. Bentabal, and together, they reported the rape to the local police. During the investigation, Nenita revealed that Miguel had raped her twice on previous occasions under similar circumstances.

Smarting under accusations, Miguel offered a different story, claiming he was at home with his wife, and after dinner, they all went to sleep without incident. He narrated being confronted the next day at a meeting with men who took him to the police and physically assaulted him during transport.

A medical examination substantiated Nenita's account, with Dr. Emmanuel Aranas affirming signs of sexual assault corroborating her story of multiple occurrences. Miguel Servo was charged and pleaded not guilty. During the trial, the prosecution presented Nenita's testimony and that of Dr. Aranas while the defense contested the credibility of the evidence, emphasizing delayed reporting and alleging contradictions in Nenita's account.

After hearings, the RTC of Antipolo found Miguel Lucban Servo guilty of rape and sentenced him to reclusion perpetua. Dissatisfied with the decision, the accused-appellant appealed to the Supreme Court, contesting the reliability of Nenita's testimony and the sufficiency of evidence for conviction.

****Issues:****

1. Whether the testimony of Nenita Bentabal was credible and sufficient to support a conviction for rape beyond a reasonable doubt, despite being uncorroborated by direct physical evidence.
2. Whether the delay in reporting the incident to law enforcement affected the credibility of the victim's testimony.
3. Whether the interpretation and explanation of terms during testimony affected the trial's

outcome.

Court's Decision:

1. **Credibility of Testimony:** The Supreme Court affirmed that the testimony of the victim in rape cases, when credible and sincere, could singularly support a conviction, especially considering the nature of the crime that often occurs without witnesses. The Court found Nenita's testimony credible despite the accused-appellant's arguments.
2. **Delay in Reporting:** The Court held that the delay in reporting incidents of rape, particularly by minors, does not necessarily imply falsehood. Various factors, such as threats by the assailant and emotional distress, often lead to delays. The threats by Miguel to harm Nenita and her mother justified her delayed disclosure.
3. **Terminology and Testimony Comprehension:** The Court found that a lack of comprehension of complex sexual terminology by a young, unsophisticated victim does not inherently discredit her. Hence, the misunderstanding of "orgasm" was immaterial.

The Court affirmed the trial court's decision, upholding the conviction and imposed penalty, but added civil indemnity and moral damages of P50,000 each to be awarded to the victim.

Doctrine:

The decision reiterated that a victim's credible testimony can be sufficient for a conviction in rape cases. The court emphasized that there is no standard reaction to rape, particularly for minors, and delayed reporting does not undermine veracity. It also highlighted the court's responsibility to assess the comprehension of terms by young witnesses and ensure fairness during testimony.

Class Notes:

- **Elements of Rape:** Carnal knowledge of a woman forcibly and against her will.
- **Credibility of Victim's Testimony:** Essential in rape cases; can solely sustain a conviction if straightforward and unblemished by material inconsistencies.
- **Consideration of Delay in Reporting:** Not detrimental if threats or psychological factors explain it.
- **Influence of Relationship:** The stepfather-stepdaughter dynamic here introduced moral ascendancy and influence, adding to the analysis of force and intimidation.

Historical Background:

The case echoes the systemic issues surrounding familial assault incidents, particularly

attitudes towards reporting sexual crimes within the family setting. It reflects a judicial commitment to uphold victims' rights amidst social stigma, emphasizing evolving legal norms regarding testimonial reliability in sensitive circumstances like rape. As societal views on such crimes evolved, it's crucial to document such cases for their role in shaping jurisprudence over time.