

Title: People of the Philippines vs. Gregorio Corpuz y Espiritu (G.R. No. 147678-87, February 19, 2007)

Facts:

- Initial Living Arrangements:** Juvilie Corpuz y Antonio, a 13-year-old, lived with her father, Gregorio Corpuz, and her two younger sisters in Gattaran, Cagayan, while her mother worked in Hong Kong.
- Preceding Incidents:** Juvilie experienced molestation by her father on separate occasions before the principal incident, discovering him fondling her but he denied his actions.
- Night of the Incident:** On November 17, 1996, Juvilie awoke to find her father on top of her. After she pushed him away and shouted at him, he moved and apologized, stating he was dreaming.
- Immediate Aftermath:** Her cry startled her sisters, and they fled the room. Juvilie was prevented from leaving the room by her father, who threatened her.
- Disclosure of the Crime:** Juvilie confided in her uncle 10 days later. Subsequently, a police report was filed, and an examination confirmed lacerations consistent with rape.
- Filing of the Case:** An information for qualified rape was filed on March 20, 1997. Gregorio pleaded not guilty.
- Trial Proceedings:** The prosecution presented testimonies from Juvilie, her uncles, and the examining doctor. The defense presented only Gregorio's testimony.
- Amendment of Information:** The trial judge ordered the Information to be amended to reflect rape committed while the victim was unconscious instead of by force, to align with evidentiary findings.
- Conviction:** On July 19, 1999, the RTC found Gregorio guilty, sentenced him to death, and ordered him to pay various damages.
- Court of Appeals Review:** On automatic review, the Supreme Court referred the case to the Court of Appeals, which affirmed the conviction with modifications in the damages awarded.

****Issues:****

1. ****Credibility of Identification:**** Whether the circumstances allowed Juvilie a reliable identification of her father given the lighting conditions and initial unconsciousness.
2. ****Amendment of Information:**** Whether the trial court erred in ordering the amendment of the Information on the mode of commission from “by force and intimidation” to “while asleep and unconscious.”
3. ****Sufficiency of Evidence:**** Whether the prosecution’s evidence was sufficient to convict Gregorio despite claims of misidentification due to darkness.
4. ****Penalty Imposition:**** Whether the death penalty was correctly imposed given the victim’s minority and her relation to the appellant.

****Court’s Decision:****

1. ****Identification Credibility:**** The Supreme Court found Juvilie’s identification credible. She provided a coherent and unwavering account of the incident, and familiarity with her assailant eliminated doubts.
2. ****Amendment of Information:**** The Supreme Court ruled that the amendment did not affect Gregorio’s substantial rights, as it conformed with presented evidence and did not alter the crime of qualified rape.
3. ****Sufficiency of Evidence:**** The Court emphasized that Juvilie’s consistent testimony and the corroborative medical evidence sufficed to prove Gregorio’s guilt beyond reasonable doubt.
4. ****Penalty Justification:**** The Court affirmed the death penalty, citing qualified rape due to the victim’s minority and the familial relation, satisfying the requirement for the harsher penalty.

****Doctrine:****

The case reaffirmed that in rape accusations, especially incestuous ones, the victim’s testimony, if credible, is sufficient for conviction. It also permitted amendments to the Information if it conformed to the evidence and did not prejudice the substantial rights of the accused. The Court highlighted the sufficiency of voice identification in familiar settings

and reasserted that parental influence negates the necessity of proving force in incestuous rape cases.

****Class Notes:****

- ****Elements of Qualified Rape:**** Carnal knowledge with the victim unconscious; victim under 18; offender is a parent.
- ****Legal Provisions Involved:**** Article 335 of the Revised Penal Code on rape, considering changes under R.A. No. 7659 regarding death penalty imposition.
- ****Amendment of Information:**** Permitted if the amendment aligns with evidence and respects the accused's right to informed defense.
- ****Witness Credibility:**** Direct testimonies as primary evidence, especially with corroborative physical findings.

****Historical Background:****

This case occurred during a time when there was heightened enforcement of the death penalty in the Philippines for heinous crimes, including qualified rape. It reflects societal challenges like parental abuse within family homes where economic conditions force one parent to work abroad, leaving children vulnerable to domestic abuse. It embodies the cultural sensitivities surrounding familial respect and the stigma attached to rape victims, especially minors. The inclusion of voice recognition as evidence set a significant precedent in recognizing the unique fears and familial dynamics in domestic abuse cases.