

People of the Philippines v. Armando Regala y Abriol

Facts

On the evening of September 11, 1995, in Barangay Bangon, Municipality of Aroroy, Province of Masbate, Armando Regala and two unidentified accomplices broke into the home of Consuelo Arevalo and her granddaughter Nerissa Tagala. The assailants removed pieces of wood from under the stove to gain access through the kitchen.

They entered the room where Consuelo and Nerissa were sleeping. Armando Regala pointed an 8-inch gun at them and hogtied both. Regala then raped Nerissa twice—initially in bed where her grandmother was on the floor, and subsequently in the kitchen. Following the assaults, Regala and his companions stole P3,000 in cash, two gold rings worth P6,000, and two wristwatches valued at P5,000.

The next day, Nerissa was examined by Municipal Health Officer Dr. Conchita Ulanday, who found lacerations on her hymen, indicating recent sexual assault.

Four days later, Regala was apprehended and identified by both Consuelo and Nerissa in a police lineup.

Procedural Posture

Regala was charged with Robbery with Rape. The Regional Trial Court of Masbate convicted him, imposing reclusion perpetua, monetary indemnities, moral damages, and exemplary damages. Regala appealed, alleging errors in the identification and sufficiency of evidence supporting his conviction.

Issues

1. **Identification of the Accused-Appellant:**
 - Whether the trial court erred in finding sufficient evidence to establish Regala as the perpetrator.
2. **Sufficiency of Evidence:**
 - Whether the trial court erred in finding Regala guilty beyond reasonable doubt.

Court's Decision

The Supreme Court affirmed the conviction, with modifications regarding civil indemnity.

1. **Identification of the Accused-Appellant:**

- The defense of alibi was insufficient against the positive identification made by Nerissa and Consuelo.
- Nerissa visually identified Regala despite poor lighting conditions, facilitated by a flashlight reflection and his distinctive earring.
- Consuelo corroborated Nerissa's testimony, particularly noting Regala's facemask removal and the flashlight used during the robbery.

2. **Sufficiency of Evidence:**

- Nerissa's testimony was consistent and credible.
- Dr. Ulanday's medical report corroborated the occurrence of rape.
- The defense's claim of voluntary sexual submission was rendered implausible given the circumstances of Nerissa being hogtied.

Doctrine

1. **Positive Identification Over Alibi:**

- Courts give greater weight to the direct and positive identification of the perpetrator by credible witnesses over the defense of alibi.

2. **Illumination Sufficiency:**

- Various light sources, even moonlight or a flashlight, can be adequate for proper identification of assailants during nighttime crimes.

Class Notes

- **Key Concepts:**

- **Positive Identification:** The weight of eyewitness identification against defenses like alibi.
- **Credibility of Witnesses:** Consistency and corroboration in testimonies.
- **Sufficient Illumination:** Courts may deem minimal light sources sufficient for identification.
- **Legal Provisions:** Article 294 of the Revised Penal Code; reclusion perpetua for Robbery with Rape, RA 7659 standards.
- **Statutes:**
- **Article 294, Revised Penal Code:** Robbery with rape penalized by reclusion perpetua to death.

- **RA 7659:** Amendments affecting penalties for heinous crimes, including robbery with rape.

Historical Background

During the mid-1990s in the Philippines, increased crime rates spotlighted issues of grave offenses like robbery combined with sexual violence. The amendment under RA 7659 was part of legislative efforts to address such heinous crimes with stringent penalties, reflecting public demand for justice and deterrence of egregious offenses. This case underscores the judiciary's commitment to upholding such laws and providing justice commensurate with the gravity of the crime.