

****Title**:** People of the Philippines vs. Godofredo Sayat

****Facts**:**

On August 28, 1990, eight-year-old Marites Sayat was ordered by her half-brother Godofredo Sayat to the second floor of their newly constructed house at No. 12 Camia Street, Marville Subdivision, Barangay de la Paz, Pasig, Metro Manila, where he proceeded to rape her. The sexual abuse continued on August 29, 30, 31, and September 1, 1990, under similar circumstances each day, with Godofredo threatening Marites and forcing her to comply.

In November 1990, Marites' mother, Elisa Palicdon, returned from working abroad and was informed by a relative, Maribel Halino, about the incident. Marites then revealed the details of the repeated sexual assaults. On November 23, 1990, Marites was examined by Dr. Emmanuel L. Aranas, who confirmed healed lacerations on her hymen.

Godofredo was subsequently charged with five counts of rape. During the trial, Marites testified with straightforward, simple details, while Godofredo claimed an alibi, testifying that he was staying with his common-law wife in Manila during the incidents.

****Issues**:**

1. Whether the testimony of Marites Sayat was credible and sufficient to prove the occurrence of rape.
2. Whether the prosecution satisfied the burden of proving Godofredo Sayat's guilt beyond a reasonable doubt.
3. Whether the defense of alibi presented by Godofredo Sayat was adequate and credible.
4. Whether the alternative circumstance of the relationship between the appellant and the victim could be considered without a formal offer of the birth certificate.
5. Whether delay in reporting the rape incident impacted the credibility of the complaint.

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

1. The Court affirmed the credibility of Marites' testimony, finding her straightforward and consistent narrative reliable. The simplicity and coherence of her statements showed she was not fabricating her accusations.
2. The evidence presented by the prosecution, including physical examination results and the victim's detailed testimony, overwhelmingly proved the guilt of Godofredo Sayat beyond a reasonable doubt.
3. The alibi defense was rejected based on its inherent weakness and lack of corroborating

evidence. Godofredo's failure to produce his common-law wife as a witness further weakened this defense.

4. The birth certificate, crucial as evidence of relationship, was not formally offered, but the trial testimony confirmed that appellant and victim were half-siblings, which substantiated the relationship aggravating circumstance.

5. The delay in reporting the crimes was found reasonable given Marites' fear of the threats made by Godofredo, and the court ruled that such delay did not undermine her credibility.

****Doctrine**:**

1. The testimony of a rape victim, especially a child, warrants sensitivity and accommodates minor lapses in recounting traumatic events.

2. The defense of alibi must establish the impossibility of the accused's presence at the crime scene, and a weak or uncorroborated alibi is usually insufficient against strong positive evidence of guilt.

3. In cases of statutory rape, consent is irrelevant, and the incapacity to consent conclusively covers children below twelve years.

4. Procedural missteps, such as failing to offer crucial documentary evidence formally, can be mitigated by consistent testimonial evidence establishing factual elements like relationships in rape involving minors.

****Class Notes**:**

1. ****Rape and Statutory Rape**:** Rape under Article 335(3) of the Revised Penal Code imposes reclusion perpetua when the victim is a minor below twelve years.

2. ****Credibility of Witness**:** Importance of the trial court's opportunity to observe demeanor and credibility, especially in sensitive cases like rape.

3. ****Alibi as a Defense**:** Requires strong, clear evidence to prove the impossibility of the accused's presence at the crime scene.

4. ****Fear and Intimidation**:** Recognized as factors that can justify delayed reporting in crimes involving sexual offenses.

5. ****Relationship in Aggravating Circumstances**:** Admissibility and verification of familial relationships can be through credible testimony absent documentary proof.

****Historical Background**:**

This case exemplifies the stringent stance of Philippine jurisprudence on crimes involving minors, reflecting societal abhorrence towards rape, especially within familial contexts. It highlights the judicial commitment to protecting minor victims and ensuring justice amidst procedural and substantial discrepancies. The Court underscores community and legal

norms reinforcing child protection against sexual abuse, even when procedural missteps occur.