

Title: People of the Philippines vs. Danilo Excija

Facts:

On 29 December 1993, Jocelyn Baylon, a 17-year-old girl, alleged that Danilo Excija raped her in his house in Imperial Subdivision, Legazpi City. Excija had held her hands behind her back, dragged her to a room, covered her mouth, and threatened her with a handgun. He pushed her onto the bed, slapped her, undressed her by force, and subsequently raped her. After the act, Excija warned her not to disclose the incident to anyone, threatening to kill her family. Subsequently, on 12 January 1994, following a beer drinking spree, Excija reportedly raped her again at the Xandra Hotel and reassured her about marriage. The next day, they went to a beach in Sorsogon, where Excija again raped her twice.

The series of events led to the filing of a sworn complaint by Jocelyn on 17 January 1994, leading to the arrest of Excija on 27 March 1994. A preliminary investigation resulted in the Assistant City Prosecutor finding probable cause to file three separate informations for rape under Article 335 of the Revised Penal Code. Each of the criminal cases was filed on 16 March 1994 in different branches of the RTC Legazpi City.

In Criminal Case No. 6641, Excija pleaded not guilty at the arraignment on 19 April 1994. The trial commenced with various witnesses testifying, including Jocelyn and a city health officer who examined her. Defense witnesses, including Excija and his associates, gave testimonies contradicting Jocelyn's allegations.

Issues:

1. **Credibility of Jocelyn's Testimony:** Whether the trial court erred in finding Jocelyn's testimony credible based on the absence of evidence suggesting an improper motive.
2. **Denial of Motion for New Trial:** Whether the trial court gravely abused its discretion in denying Excija's motion for a new trial on the grounds of newly discovered evidence.

Court's Decision:

1. **Credibility of Jocelyn's Testimony:** The Supreme Court upheld the trial court's findings that Jocelyn's testimony was credible and consistent. The trial court's assessment was backed by direct and straightforward testimony from Jocelyn, establishing the elements of force and intimidation, presence of threats, and use of a firearm during the rape incident. The court ruled that absent any ill-motive on Jocelyn's part, her testimony deserved full faith and credit.
2. **Denial of Motion for New Trial:** The Supreme Court found no abuse of discretion by

the trial court in denying the motion for new trial. The so-called newly discovered evidence, such as testimonies of Ampy Bergado and letters from Jocelyn, were not considered genuinely new as they could have been discovered through due diligence during the trial. Moreover, the trial court observed that these pieces of evidence did not possess the material weight to alter the judgment.

Doctrine:

- The testimony of a rape victim must be scrutinized with extreme caution, and the prosecution's evidence must stand on its own merits.
- A finding of credibility by the trial court is given great weight on appeal due to its position in directly observing the witnesses' demeanor.
- New trials in criminal cases under Section 2, Rule 121 of the Rules of Court, require strict compliance with the requisites of newly discovered evidence to alter judgments.

Class Notes:

- **Article 335 of the Revised Penal Code:** Defines and penalizes the crime of rape, mandating careful judicial assessment in cases involving young, vulnerable victims.
- **Requisites for New Trial (Section 2, Rule 121):** Requires evidence to be both newly discovered after trial and could not have been discovered earlier with reasonable diligence. The evidence must be material and not merely corroborative or impeaching.
- **Article 63 of the Revised Penal Code:** Governs the imposition of penalties where no mitigating or aggravating circumstances are present, as applied to the indivisible nature of reclusion perpetua.

Historical Background:

The case illuminates the complexities and sensitivities involved in handling rape cases in the Philippines, emphasizing the importance of protecting victims' rights while ensuring just and fair procedures for the accused. It contextualizes the judicial standards and societal expectations placed upon the testimony of young, often vulnerable victims. It also highlights legislative evolutions in penal laws, such as the clarifications brought by RA 7659 regarding indivisible penalties for heinous crimes.