

Title:

People of the Philippines vs. Ricky Arguta alias "Joel" and Wilson Cahipe alias "Siwit"

Facts:

On January 30, 1997, two criminal informations were filed at the Regional Trial Court (RTC) of Tacloban City:

- Crim. Case No. 97-02-76 charged Cahipe and Arguta with conspiracy to commit rape on December 5, 1996.
- Crim. Case No. 97-02-77 charged Cahipe alone with committing a second act of rape later the same evening.

Detailed Series of Events:

1. **December 5, 1996:** AAA, instructed by her father to fetch her sister, failed and decided to return home.
2. **On her way home:** Arguta and Cahipe intercepted her.
3. **At a nearby beach resort:** They threatened her with a bladed weapon, dragged her to a cottage, bound her hands and feet, and raped her in turn.
4. **Post-rape event:** An hour later, Cahipe returned, dragged AAA to a nearby store, raped her again, and then left her back at the cottage.
5. **Next day:** AAA was found crying by her father at the cottage.

Procedural Posture:

1. The RTC found accused-appellants guilty of simple rape in Crim. Case No. 97-02-76, sentencing them to reclusion perpetua.
 - Acquitted Cahipe of Crim. Case No. 97-02-77 due to inconsistencies and lack of evidence.
2. Accused-appellants appealed to the Court of Appeals (CA).
3. **CA Ruling (April 24, 2014):** Affirmed the RTC's decision but modified damages awarding exemplary damages and interest on all monetary awards.
4. Accused-appellants filed an appeal to the Supreme Court.

Issues:

1. **Whether the conviction for Rape in Crim. Case No. 97-02-76 should be upheld.**
2. **Whether there are grounds to reclassify the crime from Simple Rape to Qualified Rape.**

Court's Decision:

1. **Conviction for Crim. Case No. 97-02-76:**

- Affirmed as factual findings of AAA's consistent and credible testimony, corroborated by physical evidence, outweigh accused-appellants' defense.
- Intimidation was clearly established with the use of a bladed weapon, maintaining her state of fear.

2. **Reclassification to Qualified Rape:**

- Rape was committed by threatening AAA with a deadly weapon and two persons were involved, fulfilling the criteria for Qualified Rape.
- Relevant provision from Article 335 of the RPC (prevailing during the time of the crime): Imposes reclusion perpetua to death for rape with use of deadly weapon or by two or more persons.
- Precise application of law as clarified in *People v. Lamberte* led to appropriate enhancement per presence of qualifying circumstances.

3. **Penalty and Damages:**

- Sentenced accused-appellants to reclusion perpetua without eligibility for parole.
- Modified damages: P75,000.00 civil indemnity, P75,000.00 moral damages, P30,000.00 exemplary damages.
- Imposition of 6% per annum interest from the finality until fully paid.

Doctrine:

- **Qualifying circumstances in rape:** Use of a deadly weapon or involvement of two or more persons results in Qualified Rape, warranting increased penalties.
- **Victim's perception in force or intimidation:** Not necessary for force to be overpowering, the victim's fear that resistance is futile suffices.

Class Notes:

- **Elements of Rape (under Article 335, RPC):**
 1. Carnal Knowledge of a woman.
 2. Accomplished through force/intimidation, when victim deprived of reason/unconscious, or victim under 12/demented.
- **Qualified Rape:**
 - Presence of deadly weapon or by two/more persons.
- **Statutory References:**
 - *Article 335, Revised Penal Code* (Pre-RA 8353 amendments).
 - Post-RA 8353 equivalency in *Article 266-B*.
 - Parole ineligible under *RA 9346*.

- **Interest on Damages**: 6% per annum post-finality.

Historical Background:

- **Before RA 8353**: Rape was classified under crimes against chastity in the RPC.

- **RA 8353 (The Anti-Rape Law of 1997)**: Expanded rape definitions including reclassification as a crime against persons.

- **RA 9346**: Abolition of death penalty impacting sentencing phases to reclusion perpetua without parole eligibility.

The case reflects the application of judicially broadened doctrines in assessing qualifying factors for graver liability, emphasizing the weight of victim's testimony against nominal defenses.