

****Title:****

People of the Philippines v. Dioni Miranda y Pareña, A.K.A. "Abe"

****Facts:****

Dioni Miranda y Pareña, also known as "Abe", was charged with Qualified Statutory Rape under Article 266-A, paragraph (1)(d), in relation to Article 266-B of the Revised Penal Code (RPC) following an incident on September 17, 2015. The victim, AAA, was seven years old at the time of the crime and was under Miranda's guardianship, albeit informally, as he was referred to as her "tatay-tatayan." AAA recounted multiple instances of sexual abuse by Miranda, including one specific incident where Miranda raped her, ordered her to lie on an anthill, and urinated on her.

The case was brought before the RTC, where the prosecution presented AAA, Dr. Elise V. Cruz (the examining physician), and Rosalie Apolinario (a neighbor who heard AAA's cries and whom AAA confided in). Miranda denied the allegations, attributing AAA's distress to a scolding incident.

The RTC convicted Miranda of Statutory Rape, appreciating the aggravating circumstance of ignominy. The CA affirmed the RTC's decision but also noted that Miranda should have been convicted of Qualified Statutory Rape, considering his guardianship role and the victim's age. Miranda appealed to the Supreme Court on the grounds of procedural and substantive errors.

****Issues:****

1. Whether the CA erred in convicting Miranda of Statutory Rape while appreciating the qualifying circumstance of guardianship and the aggravating circumstance of ignominy despite procedural lapses in the Information.
2. Whether the elements of Statutory Rape were sufficiently proven beyond reasonable doubt.

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

1. ****Element of Statutory Rape: Conclusive Evidence****:

- The Supreme Court affirmed that the prosecution had sufficiently proven both elements of Statutory Rape: the victim was under 12 years of age (seven years old at the time) and Miranda had carnal knowledge of her. AAA's detailed, unequivocal testimony, supported by

medical findings from Dr. Cruz and corroborated by Apolinario, was credible and sufficient. The Court emphasized the credibility given to testimonies of young, immature rape victims, and noted that AAA had no ill motive to falsely accuse Miranda.

2. **Disqualification of Qualifying Circumstances**:

- The Supreme Court held that the qualifying circumstance of guardianship and the aggravating circumstance of ignominy could not be appreciated. These were not properly alleged in the Information in accordance with procedural requirements. Specifically, while the RTC and CA had acknowledged ignominy and the relationship of guardianship, the Supreme Court found that Miranda was not AAA's legal guardian but merely her "tatay-tatayan." Furthermore, under legal standards, such circumstances must be strictly alleged in the Information, and any defects labeled under broad terms cannot be cured merely by failure to object without clear articulation in the Information.

3. **Modification of Penalty and Damages**:

- The Supreme Court modified the sentence of Miranda from Qualified Statutory Rape to Statutory Rape, sentencing him to reclusion perpetua without stating "without eligibility for parole" as the death penalty is neither warranted nor applicable. The civil indemnity, moral damages, and exemplary damages were ordered at P75,000.00 each, accruing legal interest as appropriate.

Doctrine:

1. **Elements of Statutory Rape**: Proof that the victim is below 12 years old suffices to establish Statutory Rape without necessitating evidence of force or intimidation.
2. **Requirement of Specific Allegation**: Qualifying and aggravating circumstances must be precisely stated in the Information to warrant consideration, thus ensuring defendants' right to be fully informed of charges against them.
3. **Youthful Testimony**: The Court gives great credence to the testimonies of young rape victims due to their presumed innocence and lack of motive to fabricate grave allegations.

Class Notes:

- **Statutory Rape**: Key components include the age of the victim (below 12) and the occurrence of carnal knowledge, without needing proof of force, threat, or intimidation.
- **Qualifying Circumstances**: Must be expressly stated in the Information; failure to do so prohibits their consideration.
- **Aggravating Circumstances**: Require specific allegation and proof.

- ****RTC and CA proceedings****: They observed due process in conviction but fell short in accurately alleging the circumstances warranting higher penalties (e.g., guardianship and ignominy).
- Relevant Provisions:
 - Article 266-A RPC: Defines the circumstances under which rape is committed.
 - Article 266-B RPC: Addresses the penalties for rape, including qualified circumstances.
 - Section 8, Rule 110: Mandates the specification of qualifying and aggravating circumstances in the Information.

****Historical Background:****

The case underscores evolving legal interpretations in the Philippines regarding the procedural rigor and substantive justice in rape cases, particularly those involving minors. The case exhibits the stringent adherence to procedural rules to protect the constitutional rights of the accused while affirming the judicial system's resolve to provide justice for victims of sexual violence.