

Title

****People of the Philippines vs. Delfin Castro y Lozada****

Facts

****Step-by-Step Events:****

1. ****Date of Incident:**** On October 4, 1986, six-year-old Diana Rose Castro was playing with a neighbor when she was pulled by the accused, Delfin Castro y Lozada, into a bathroom.
2. ****Assault:**** Delfin, referred to as Kuya Delfin, made Diana stand on the toilet bowl, pulled up her clothes, took off her panty, and inserted his private part into hers despite her resistance, causing pain.
3. ****Aftermath:**** Diana, in pain, refused to let her Auntie Alice wash her private part upon returning home.
4. ****Discovery:**** On October 6, 1986, Diana's grandmother, Jacinta Castro, noticed Diana refusing to eat and continuously crying. Upon inspection, she discovered Diana's swollen and reddened private part.
5. ****Revelation:**** Diana initially claimed she was hurt from being snagged by iron sheets but eventually revealed that Delfin made her stand on a toilet bowl, removed her panty, and had sexual intercourse with her.
6. ****Medical Examination:**** On October 8, 1986, Jacinta took Diana to the National Bureau of Investigation (NBI). The medico-legal report showed contusions and bruises on Diana's genital area consistent with sexual trauma.
7. ****Complaint:**** A sworn complaint for rape was filed against Delfin.
8. ****Accused's Plea and Defense:**** Delfin pleaded not guilty, providing an alibi that he was at Adamson University submitting a term paper on October 4, 1986. He suggested Diana's injuries could be from tripping down the stairs and being chased by a dog.
9. ****Trial Court Proceedings:**** The Regional Trial Court of Pasay City found Diana's testimony credible and disregarded Delfin's alibi, convicting him of statutory rape and sentencing him to reclusion perpetua with a requirement to indemnify Diana in the amount of P20,000.

****Procedural Posture:****

- ****RTC Decision:**** Convicted Delfin Castro of statutory rape.
- ****Appeal:**** Delfin Castro appealed to the Supreme Court, questioning the evidence, highlighting the absence of hymenal laceration, issues of credibility, and alleging coercion by the police.

Issues

1. **Hymenal Laceration:** Whether the absence of laceration of Diana's hymen negates the occurrence of rape.
2. **Standing Position:** Whether it is plausible that the rape occurred while Diana was standing on a toilet bowl.
3. **Virginity:** If Diana's remaining a virgin contradicts the occurrence of rape.
4. **Credibility of Testimonies:** Whether the Regional Trial Court erred in relying on Diana's testimony over Delfin's alibi.
5. **Coercion and Torture:** Validity of Delfin's claim that his admission was coerced by police brutality.

Court's Decision

1. **Hymenal Laceration:** The Supreme Court reiterated that a lacerated hymen is not necessary for the crime of rape. Even the slightest penetration constitutes rape.
2. **Standing Position:** The Court found it plausible that Diana was raped while standing on a toilet bowl, as it aligned her private part with that of Delfin's, facilitating the act.
3. **Virginity:** Remaining a virgin does not negate rape. Diana's age and the nature of the minor penetration observed were consistent with her testimony.
4. **Credibility of Testimonies:** The Supreme Court upheld the RTC's finding of Diana's testimony as credible and consistent. They found Delfin's alibi and his attacks on the victim's credibility unconvincing.
5. **Coercion and Torture:** The Court dismissed Delfin's claims of coercion and torture as unsubstantiated. His coerced admission did not affect the prosecution's case, which was built on other substantial evidence.

Doctrine

- **Penetration in Rape:** For rape to be established, full penetration is not required. Entry of the male organ to any extent within the labia or pudendum suffices.
- **Credibility of Child Witnesses:** The consistent and straightforward account of a child witness in cases of sexual assault is given significant weight.
- **Alibi Defense Weakness:** Alibi is inherently weak, particularly when the accused fails to prove physical impossibility to be at the crime scene.

Class Notes

- **Elements of Statutory Rape (Art. 335, RPC):**
 1. Carnal knowledge by a man.
 2. Victim is under 12 years old.
 3. Lack of necessary consent irrelevant due to victim's age.

- **Legal Provisions:**
- **Art. 335, Revised Penal Code:** Defines statutory rape.
- **People v. Bay (27 Phil 495):** Confirmation that vaginal laceration is not necessary for rape.
- **Application in Case:** The Court emphasized that minor penetration and credibility of a child victim's testimony are sufficient for a rape conviction. Disregarding claims of physical implausibility and the accused's alibi strengthened the prosecution's case.

Historical Background

This case exemplifies the strict legal stance of Philippine jurisprudence in upholding convictions for statutory rape, emphasizing the protection of minors. During the 1980s, child sexual assault cases brought to attention the gravity of societal issues surrounding child protection and reinforced the need for judicial reforms to ensure stringent penalties against such heinous acts. The ruling underscores the Court's commitment to safeguarding minors and delivering justice against sexual predators.