

### Title: People of the Philippines vs. Juan P. David, G.R. No. 258 Phil. 349

### Facts:

- Background**: Accused Juan P. David met Adelaida Masupil in late 1978, and they became romantically involved. By December 1980, they were living in the house of Adelaida's sister, Toribia Aguilar, located in Quezon City.
- Incidents**: Between April and May 1982, a series of rapes allegedly occurred. Luz Delgado, the housemaid, testified to being raped by David four times:
  - First Rape (First week of April 1982)**: Luz was ordered upstairs, locked in the room, and forced to read pornographic materials before being raped under knife threat.
  - Second Rape (Second week of April 1982)**: Luz was fixing clothes on the ground floor when David entered, locked the door, threatened her, and raped her.
  - Third Rape (Third week of May 1982)**: She was sent on an errand to David's room, followed by him, threatened with a knife, and raped.
  - Fourth Rape (Fourth week of May 1982)**: Occurred in the children's bedroom at night; David entered through an adjoining bathroom and raped her while holding a knife.
- Theresa Aguilar**: Theresa, six years old, was allegedly molested in May 1982. She testified to two specific incidents:
  - First Rape**: Called upstairs, stripped, and his penis placed against her vagina, causing pain.
  - Second Rape**: Occurred with her and her sister in the room; David inserted his finger in her vagina.
- Aftermath**: Both victims reported the events later due to fear. Medical examinations confirmed physical signs consistent with their testimonies.
- Procedural Posture**: After the discovery of the rapes, the victims were taken to the PC Crime Laboratory for further medical examinations. Complaints were then filed leading to the trial at the Regional Trial Court of Quezon City, Branch 106, which found David guilty of five counts of rape.

### Issues:

- Sufficiency of Evidence**: Whether the common testimonies and medical evidence sufficiently proved David's guilt beyond a reasonable doubt.
- Influence of Delays and Inconsistencies**: Whether the delay in reporting the incidents and minor inconsistencies in testimonies affected the credibility of the rape charges.

3. **Consolidation of Charges**: Whether the consolidation of the five separate charges for rape was appropriate and fair.
4. **Credibility of Complainants**: Whether the testimonies of the complainants, given their ages and apparent lack of motive, were credible and reliable.

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

1. **Sufficiency of Evidence**: The court found the testimonies and corroborative medical evidence sufficient. Both Luz Delgado and Theresa Aguilar's testimonies were found credible despite minor inconsistencies. Luz's detailed accounts, supported by physical signs of healed lacerations and congested areas seen in medical examinations, corroborated her allegation.
2. **Delays and Inconsistencies**: The court ruled that delays in reporting were understandable due to threats made by David, and minor inconsistencies were deemed insignificant. Trauma and fear were valid reasons for inconsistencies.
3. **Consolidation of Charges**: The court held that consolidating the trials was appropriate under Rule 119, Sec. 14 of the Rules on Criminal Procedure, as the offenses charged were substantially the same and involved similar facts and evidence. The defense had full opportunity for cross-examination and presenting evidence.
4. **Credibility of Complainants**: The court affirmed the trial court's assessment of the credibility of complainants, noting that a naïve maid and a young child had little reason to fabricate such serious charges, concluding that their painful and reluctant testimonies under cross-examination were indicative of truthfulness.

**### Doctrine:**

- **Consolidation of Trials**: Under Rule 119, Sec. 14, charges for offenses founded on the same facts or forming part of a series of offenses of similar character may be tried jointly at the court's discretion.
- **Credibility of Rape Victims**: A rape victim's testimony is given weight and credibility, especially when there's no motive to falsely accuse, supported by emotional responses while recounting details.
- **Rape Evidence**: Physical signs like lacerations and vaginal redness, even without external trauma, support rape allegations, especially when consistent with victim testimonies.

**### Class Notes:**

- **Elements of Rape under Article 335 of the Revised Penal Code**:

1. **Carnal Knowledge**: Unlawful sexual intercourse.
2. **Means**: Use of force, threat, or intimidation, or committing the act with a victim under 12.

- **Procedural Consolidation**: Cases with similar factual backgrounds or evidence can be tried together for efficiency (Rule 119, Sec. 14).

- **Victim Testimony**: Rape victims' testimonies hold substantial weight; delays in reporting often attributed to fear and threats.

### ### Historical Background:

This case occurred during a period in the Philippines characterized by increased legal scrutiny of sexual crimes, which reflects the grapple of societal norms with the jurisprudence to protect vulnerable victims, particularly women and children, from sexual violence. This backdrop underscores the judiciary's firm stand to resolve such crimes with a strong basis on credible witness testimonies reinforced by medical evidences.