

****Title: People of the Philippines vs. Carlito Espenilla****

****Facts:****

On October 20, 1995, in Masbate, Philippines, AAA, a 13-year-old girl, was allegedly raped by Carlito Espenilla, her stepmother's brother. AAA's father and stepmother were at a farm, leaving her alone with her siblings. Espenilla came to their home, requested a tobacco leaf and newspaper, and followed AAA into a room, closing the door. Espenilla threatened AAA with a bolo, undressed her, and then raped her, warning her not to disclose the incident. Later that day, Espenilla allegedly raped her again when her parents were away. Overwhelmed, AAA eventually confided in Brgy. Captain Floro Medina, who informed her father, BBB.

AAA was medically examined on January 7, 1999, revealing old healed hymenal lacerations. AAA and her father filed a complaint, initiating a case against Espenilla. Another complaint against AAA's grandfather, CCC, was dismissed after CCC's death. Initially, in the Regional Trial Court (RTC) of Masbate City, Espenilla pleaded not guilty. During the trial, the defense presented testimony from AAA's father and Espenilla, while AAA alone testified for the prosecution. The RTC found Espenilla guilty of simple rape and sentenced him to reclusion perpetua. Espenilla appealed.

****Issues:****

1. Was the testimony of the rape victim AAA credible and consistent, thereby proving Espenilla's guilt beyond a reasonable doubt?
2. Did the delay in reporting the rape incident affect the credibility of the charge against Espenilla?
3. Does the Affidavit of Recantation by AAA's father substantiate claims that the rape allegation was fabricated?

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

1. ****Credibility of AAA's Testimony:**** The Supreme Court affirmed the RTC and Court of Appeals' findings, emphasizing that the victim's testimony was delivered clearly and convincingly, supporting her allegations of rape. Her detailed narrative and the presence of threats coercing silence were found credible, overriding the defense's claim of fabrication due to a familial dispute.

2. **Delay in Reporting:** The Court dismissed the argument that the delay discredited AAA's allegations. Citing jurisprudence, the Court emphasized that delays in reporting rape due to intimidation do not detract from a victim's credibility. AAA feared for her life and her family's safety, which explained the postponement in disclosure.

3. **Affidavit of Recantation:** The court heavily scrutinized the father's Affidavit of Recantation, doubting its reliability due to lack of substantive corroboration. It stressed that recantations can be easily manipulated and do not automatically nullify initial testimonies. The original allegations made by AAA were deemed more credible, further bolstered by medical findings.

The Supreme Court upheld the conviction for simple rape, modifying only the damages awarded to include exemplary damages of P30,000, besides civil indemnity and moral damages.

Doctrine:

The case underlines the doctrine that victim testimony in rape cases can solely substantiate a conviction if it is credible and convincing. It also reiterates skepticism towards affidavits of recantation, maintaining that credible initial testimonies hold precedence. It affirms that delays in reporting rape due to fear or threats do not undermine victim credibility.

Class Notes:

- **Rape Elements** under Article 335 (before R.A. 8353): 1) Carnal knowledge of a victim; 2) Accomplished through force, intimidation, or when the victim is below 12 or mentally incapacitated.
- **Victim Testimony:** Can independently prove rape if credible.
- **Recantation:** Generally unreliable and requires substantial evidence to override initial testimony.
- **Delay Reporting:** Fear-induced delays should not undermine victim testimony.
- **Relevant Statute:** Article 335 of the Revised Penal Code.

Historical Background:

Before Republic Act No. 8353 took effect in 1997, which reclassified rape as a crime against persons instead of chastity, Article 335 defined rape in terms of force or when the victim is incapacitated. This case occurred before those changes, impacting its procedural handling

and legal evaluation under the older statute. The case also highlights societal challenges in rural areas and the potential manipulation of familial relationships in legal accusations, reflected in the backdrop of 1990s Philippines amidst evolving legal frameworks for sexual offenses.