

****Title**:** People of the Philippines v. Conrado Lucas y Briones, G.R. No. 302 Phil. 570 (1992)

****Facts**:**

1. In November 1982, 9-year-old Chanda Lucas accused her father, Conrado Lucas, of rape and claimed continued abuse until she was 17.
2. On 16 February 1991, she filed complaints of rape and attempted rape at the Regional Trial Court (RTC) of Quezon City, Branch 104.
3. The complaints alleged rape in November 1982 and attempted rape on 12 February 1991.
4. The trial saw Chanda, her sister Cynthia, and Dr. Emmanuel Aranas testifying for the prosecution.
5. Cynthia witnessed the 1983 rape incident but reported the event to no avail, as their mother did not act on it.
6. The defense claimed the allegations were instigated by other relatives due to strained familial relationships, denying all accusations.
7. On 28 October 1992, the RTC convicted Conrado of two counts of rape, each punishable by reclusion perpetua, and mandated him to indemnify Chanda with a total of Php 30,000 for damages.

****Procedural Posture**:**

1. Lucas appealed, arguing errors in witness credibility, misapplication of evidence to charges, and lack of proof beyond a reasonable doubt.
2. The Supreme Court reviewed the case focusing on legal and factual findings to address the appellant's three main errors on appeal.

****Issues**:**

1. Whether the RTC correctly assessed the credibility of the witnesses' testimonies.
2. Whether Lucas could rightly be convicted of rape based on a complaint for attempted rape.
3. Whether Lucas was proven guilty beyond reasonable doubt for the 1983 rape incident.

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

1. ****Credibility of Testimonies**:**
 - The Supreme Court found no reason to diverge from the RTC's credibility assessment,

affirming the convictions based on the testimonies of Chanda and Cynthia as they were deemed compelling and consistent.

- The Court acknowledged the coercive power Lucas held over Chanda due to their familial dynamics, thereby interpreting the delay in reporting consistent with psychological and situational intimidation.

2. **Conviction for Attempted Rape**:

- The Supreme Court ruled the appellant could not be convicted of consummated rape under a complaint for attempted rape due to procedural amendments in charging.

- Lucas was convicted of attempted rape for the 1991 incident, consistent with the indictment.

3. **Corroboration and Proof Beyond Reasonable Doubt**:

- Recognizing statutory rape, the conviction stood since Chanda was under 12 at the initial rape time.

- The Court upheld the sentence for the completed rape occurring in 1983 while adjusting damages and penalties based on the proof and procedural stipulations.

Doctrine:

1. **Statutory Rape**: Unlawful carnal knowledge of a female under 12 is sufficient for conviction without additional evidence of force or intimidation.

2. **Variance Doctrine**: Permits conviction for included offenses when evidence deviates from the charge but reflects elements of charged offenses.

Class Notes:

- **Elements of Rape**:

- Statutory thresholds: without force or coercion required if victim under age.

- Sufficiency of victim testimony despite delayed reporting, conditioned by fear.

- **Procedural Implications**: Accusations must align with the complaint specifics; amendments during trials adjust allegation variances, impacting conviction scope.

- **Aggravating Factor**: Relationship in crimes against chastity increases penalties.

Historical Background: The case reflects a period in judicial history where the Philippine legal system grappled with safeguarding vulnerable victims within constrained procedural frameworks. Before R.A. No. 7659 amendments, compelling narratives like those from child

victims against family members leaned heavily on protected testimony due to intrinsic relational power dynamics. This case illustrates statutory legal provisions influencing rape conviction criteria and the adaptability of legal frameworks in addressing grievous offenses amid societal dynamics.