

Title: People of the Philippines vs. Vicente Vañas y Balderama

Facts:

In the early hours of May 2009, “AAA,” a 16-year-old minor, was reportedly raped by Vicente Vañas y Balderama (“appellant”), the common-law husband of “AAA’s” mother, in Albay, Philippines. During this incident, “AAA’s” mother had left for the market, leaving the victim with the appellant. He allegedly threatened “AAA,” undressed her, and forcefully engaged in sexual intercourse with her, leaving blood in her vaginal area. On June 15, 2009, a second incident occurred at 6:00 a.m. The appellant reportedly repeated his actions while “AAA’s” mother was busy in another part of their home.

The victim later discovered she was pregnant and reported the incidents to the police, accompanied by her brother. Psychological evaluations found “AAA” to have a mental impairment with a mental age equivalent to that of an 8-year-old. These incidents led to formal charges against the appellant in two separate criminal cases: one for rape under Article 266-A of the Revised Penal Code (Criminal Case No. 6072) and the other for violation of Section 5(b) of Republic Act No. 7610 (Criminal Case No. 6073).

At the arraignment, the appellant pleaded not guilty. The trial proceeded, after which the RTC found him guilty on both counts. The appellant appealed the trial court’s decision to the Court of Appeals (CA), which affirmed the RTC’s ruling with minor modifications. Still unsatisfied, the appellant escalated the case to the Supreme Court.

Issues:

1. Whether the appellant was guilty of rape under Article 266-A of the Revised Penal Code in Criminal Case No. 6072.
2. Whether the appellant was guilty of violating Section 5(b) of RA 7610 in Criminal Case No. 6073.
3. Whether the prosecution’s evidence regarding the victim’s consent was credible and sufficient.
4. Whether constitutional rights concerning information sufficiency were violated.

Court’s Decision:

1. ****Rape (Criminal Case No. 6072):****
- The Supreme Court upheld the conviction of the appellant of qualified rape, noting that the Information sufficiently alleged that the victim was a minor and the appellant was her mother’s live-in partner. The victim’s mental impairment was significant, establishing her

inability to give valid consent. Despite the victim's statement during cross-examination, the court recognized that "carnal knowledge of a woman who is so weak in intellect" constitutes rape. The penalty was reaffirmed as reclusion perpetua without parole eligibility.

2. **Violation of RA 7610 (Criminal Case No. 6073):**

- The Supreme Court acquitted the appellant. The Information failed to adequately allege that the sexual intercourse was "with a child exploited in prostitution or subjected to other sexual abuse." The missing element led to an insufficiency in the complaint that could not be overlooked, as every element must be specifically alleged to uphold an accused's constitutional right to be informed of the accusation. Without this basis, even conclusive evidence during trial could not remedy the deficiency.

Doctrine:

- **Rape and Mental Incapacity:** Carnal knowledge of a woman who cannot understand the nature of the act due to an intellectual disability amounts to rape, devoid of consent.
- **Specificity of Information:** An Information must encompass all elements of the alleged crime. Failing this, the accused's constitutional right to know the charges fully is violated, jeopardizing any resulting conviction regardless of trial evidence.

Class Notes:

- **Rape under Article 266-A of the RPC:** Requires force, threat, or intimidation, or that the victim is incapacitated to consent.
- **RA 7610:** Protects children from sexual abuse. Claims under this Act must specify the victim's exploitation or coercion context in prostitution.
- **Constitutional Rights:** Accused must be informed explicitly of crime's details (Section 14(2), Article III of the 1987 Philippine Constitution).

Historical Background:

The context of the case is rooted in the enhanced focus on child protection laws in the Philippines, specifically following numerous legislative efforts targeting sexual abuse and exploitation in young and vulnerable populations. By dissecting elements in terms of mental capacity and procedural sufficiency, the legal landscape continues to reflect evolving definitions of consent and protection from abuse, in alignment with both Revised Penal Code provisions and specific child protection statutes like RA 7610.