Republic of the Philippines
Supreme Court
Manila

THIRD DIVISION

PEOPLE OF THE PHILIPPINES, Plaintiff-appellee,	**G.R. No. 271812***
	Present:
- versus -	CAGUIOA, *J., Acting C.J.,*** *Chairperson,* INTING, GAERLAN, DIMAAMPAO, and SINGH, *JJ.*
XXX271812 (CA G.R. CR-HC No. 16035 [Formerly Criminal Case No. 869-19]), Accused-appellant.	Promulgated: FEB 24 2026 MichDeBatt

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DECISION

DIMAAMPAO, *J.:*

This Court resolves the appeal[1] filed by accused-appellant XXX271812 challenging the Decision[2] of the Court of Appeals (CA) in CA-G.R. CR-HC No. 16035, which affirmed the Judgment[3] of Branch [redacted], Regional Trial Court, [redacted], Ifugao (RTC) finding him guilty beyond reasonable doubt of the crime of rape through force or intimidation under Article 266-A, paragraph

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* The identity of the victims or any information which could establish or compromise their identities, as well as those of their immediate family or household members, shall be withheld pursuant to Amended Administrative Circular No. 83-2015, entitled: Protocols and Procedures in the Promulgation, Publication and Posting on the Websites of Decisions, Final Resolutions, and Final Orders Using Fictitious Names/Personal Circumstances dated September 5, 2017.

** Per Special Order No. 3266 dated February 20, 2026.

1 CA *rollo*, pp. 136–140, Notice of appeal.

2 CA *rollo,* pp. 114–131. The July 5, 2023 Decision was penned by Associate Justice Raymond Reynold R. Lauigan, with the concurrence of Associate Justices Remedios A. Salazar-Fernando and Pablito A. Perez of the First Division, Court of Appeals, Manila.

3 RTC records, pp. 134–144. The June 10, 2021 Judgment in Criminal Case No. 869-19 was penned by Acting Presiding Judge Victor R. Cumigad of Branch [redacted], Regional Trial Court, [redacted], Ifugao. *See also* CA *rollo*, pp. 58–68.

1 of the Revised Penal Code, and modified the penalty by removing his eligibility for parole.

Information

XXX271812 was charged with rape in an Information, the inculpatory portion of which reads:

> That sometime in August 2018 at [redacted], [redacted], Ifugao and within the jurisdiction of this Honorable Court, the above-named accused [d]id then and there willfully, unlawfully[,] and feloniously, by means of force and intimidation, have carnal knowledge of one [AAA271812], a [12-]year[-]old minor by inserting his penis into her vagina, against her will and consent.
>
> CONTRARY TO LAW and to the damage and prejudice of the victim[-survivor].[4]

Upon arraignment, XXX271812 pled not guilty to the charge against him.[5] Pre-trial and trial proceedings ensued.

Version of the Prosecution

Sometime in August 2018, private complainant AAA271812 was staying at the house of her uncle, BBB271812, in [redacted], [redacted], Ifugao, together with her stepfather XXX271812, her mother CCC271812,[6] as well as her siblings DDD,[7] EEE, and FFF. While sleeping inside the room with her siblings, XXX271812 dragged AAA271812 outside the house. He then laid her on the ground, pulled down her short pants and panties, and inserted his penis into her vagina. After raping her, he held her neck tightly, pointed his knife at her, and threatened to kill her if she would report the incident to anyone. She later related the incident to BBB271812 and his wife, GGG271812. AAA271812 also disclosed that she began experiencing XXX271812's sexual abuse since she was 9 years old when they were still in [redacted], [redacted], Tarlac. Fearing that XXX271812 would kill her, AAA271812 did not reveal this to anyone.[8]

The Medico Legal Certificate[9] issued by Dr. Laurice G. Guillen stated AAA271812's date of birth as [redacted] and indicated a finding of "healed hymenal lacerations at 9 and 4 o'clock positions."

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4 RTC records, p. 1. *See also* CA *rollo*, p. 58.
5 RTC records, p. 19, February 27, 2019 RTC Order; 21, Certificate of Arraignment.
6 Also referred to as "[redacted]" and "[redacted]" in some parts of the records.
7 Also referred to as "[redacted]" in some parts of the records.
8 CA *rollo*, p. 116.
9 RTC records, p. 10.

Version of the Defense

XXX271812 vehemently denied the accusation against him. He admitted that he was at BBB271812's house with CCC271812, their children, and AAA271812 around August 2018 to seek financial help as he was ill. Since he was always with CCC271812, it would not have been possible for him to have done what he was accused of. XXX271812 also testified that, in 2018, AAA271812 was already 17 years old since her features were developed. He initially did not want AAA271812 to stay with them because of her character of sleeping with different men.[10]

CCC271812 corroborated XXX271812's testimony, adding that he could not have committed the crime as he loved and treated AAA271812 like his own child. Instead, it was another man who raped her daughter. CCC271812 also testified that AAA271812 was born on [redacted].[11]

Ruling of the RTC

Finding that the prosecution proved all the elements of rape, the RTC adjudged thusly:

> ***WHEREFORE***, all the foregoing premises having been duly taken into consideration, the Court finds the accused[] **[XXX271812], *GUILTY* beyond reasonable [doubt]** "BBB" [sic] of having committed the crime of *[r]ape*, and accordingly, hereby sentences him to suffer the extreme penalty of ***[r]eclusion [p]erpetua***, with all the attendant accessory penalties and disqualifications inherent to such penalty.
>
> In addition thereto, he is also ordered to indemnify the private complainant the following amounts: a) [PHP] 100,000.00 as civil indemnity; b) [PHP] 100,000.00 for moral damages and c) [PHP] 100,000.00 representing exemplary damages.
>
> All the said monetary awards shall earn 6% interest per annum, commencing from the finality of this *Decision* until the same shall have been fully satisfied.
>
> Let a *mittimus order* be issued for the immediate transfer of the accused to the National Penitentiary at Muntinlupa City.
>
> ***SO ORDERED.***[12] (Emphasis in the original)

The RTC gave full credence to AAA271812's testimony. XXX271812 forcibly laid her on the ground and had sex with her against her will and consent. After satisfying his lust, he choked her and threatened to kill her if she would reveal the incident to anyone. Moreover, considering

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10 CA *rollo*, p. 61. *See also* RTC records, p. 137.
11 CA *rollo*, p. 62. *See also* RTC records, p. 138.
12 CA *rollo*, p. 68. *See also* RTC records, p. 144.

XXX271812's moral ascendancy as CCC271812's common-law spouse, the use of actual force is no longer necessary to satisfy the third element of rape, especially since AAA271812 was a minor at the time.[13]

XXX271812 sought recourse before the CA, claiming that the RTC gravely erred in convicting him of rape. He averred that the prosecution failed to prove the second element of presence of force, threat or intimidation. Also, it was erroneous for the RTC to appreciate moral ascendancy. XXX271812 likewise poked holes in AAA271812's testimony and averred that she was not a credible witness. Additionally, the RTC erred when it did not give credence to his defense of denial.[14]

Plaintiff-appellee People of the Philippines, through the Office of the Solicitor General, opposed XXX271812's appeal, positing that all the elements of rape were proven beyond reasonable doubt. The arguments he raised were unmeritorious and cannot serve as grounds for his acquittal. AAA271812's categorical testimony prevailed over his defense of denial.[15]

Ruling of the CA

In the impugned Decision, the CA modified the ruling of the RTC, disposing as follows:

> **WHEREFORE**, the appeal is **DENIED**. The [June 10,] 2021 Judgment of [] [Branch [redacted], Regional Trial Court, [redacted], Ifugao] in Criminal Case No. 869-19, finding accused-appellant [XXX271812] guilty beyond reasonable doubt of rape through force or intimidation under Article 266-A, paragraph 1 of the Revised Penal Code is **AFFIRMED** with **MODIFICATION** in that he is sentenced to suffer *reclusion perpetua* without eligibility for parole.
>
> He is also ordered to pay the victim [AAA271812] [PHP] 100,000.00 in civil indemnity, [PHP] 100,000.00 in moral damages, and [PHP] 100,000.00 in exemplary damages. The legal interest of [6%] per [annum] is imposed on all damages awarded from the date of finality of this Decision until fully paid. Accused-appellant [XXX271812] shall also pay the costs of suit.
>
> **SO ORDERED**.[16] (Emphasis in the original)

The CA held that the RTC did not err when it convicted XXX271812 of rape. AAA271812's testimony proved that he had carnal knowledge of her through use of force, threat, and intimidation. He pulled her aside, removed her shorts and underwear, forcefully inserted his penis in her vagina, and

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13 CA *rollo*, p. 63–64. *See also* RTC records, pp. 139–140.
14 CA *rollo*, pp. 39–56, Brief for the Accused-Appellant.
15 *Id.* at 81–102, Brief for the Plaintiff-Appellee.
16 *Id.* at 26–27. *See also* CA *rollo*, pp. 130–131.

pointed a knife at her, threatening to kill her if she revealed the incident to anyone. In addition, being the common-law spouse of AAA271812's mother, XXX271812 undeniably possessed moral ascendancy over her. However, the CA modified the penalty to remove XXX271812's eligibility for parole.

Issue

Did the courts *a quo* correctly affirm XXX271812's conviction for rape?

Ruling of the Court

At the outset, the Court finds it apt to clarify its choice of terminology. In lieu of the conventional *victim* when referring to individuals who have endured sexual violence, the term *victim-survivor* shall be adopted. This deliberate choice of words recognizes the harm and suffering inflicted while affirming the agency, resiliency, and continuing dignity of those who survive such violence.

Rape and Its Qualifying Circumstances in the Case at Bench

People of the Philippines v. Arraz[17] ingeminates the definition of and the appurtenant penalty for the crime of rape, viz.:

> Article 266-A of the [Revised Penal Code], as amended by Republic Act No. 8353, defines and penalizes the crime of rape, in this manner:
>
> Article 266-A. *Rape; When and How Committed.* – Rape is committed:
>
> 1) By a man who shall have carnal knowledge of a woman under any of the following circumstances:
>
> a. Through force, threat, or intimidation;
>
> b. When the offended party is deprived of reason or otherwise unconscious;
>
> c. By means of fraudulent machination or grave abuse of authority; and
>
> d. When the offended party is under [12] years of age or is demented, even though none of the circumstances mentioned above be present.
>
> 2) By any person who, under any of the circumstances mentioned in paragraph 1 hereof, shall commit an act of sexual assault by inserting

[17] 952 Phil. 685 (2024) [Per J. Dimaampao, Third Division].

> his penis into another person's mouth or anal orifice, or any instrument or object, into the genital or anal orifice of another person.
>
> From the foregoing, the elements of rape under paragraph 1, otherwise known as "rape by sexual intercourse," are as follows: "(1) the accused had carnal knowledge of the victim[-survivor]; and, (2) the act was accomplished (a) through the use of force or intimidation, or (b) when the victim[-survivor] is deprived of reason or otherwise unconscious, or (c) when the victim[-survivor] is under 12 years of age or is demented.[18] (Citation omitted)

In this regard, Article 266-B provides for circumstances which qualifies the crime of rape—

> **ART. 266-B**. *Penalties.* – Rape under paragraph 1 of the next preceding article shall be punished by *reclusion perpetua.*
>
> Whenever the rape is committed with the use of a deadly weapon or by two or more persons, the penalty shall be *reclusion perpetua* to death.
>
> . . . .
>
> The death penalty shall also be imposed if the crime of rape is committed with any of the following aggravating/qualifying circumstances:
>
> 1. When the victim[-survivor] is under eighteen (18) years of age and the offender is a parent, ascendant, step-parent, guardian, relative by consanguinity or affinity within the third civil degree, or the common-law spouse of the parent of the victim[-survivor].

The gravamen of the crime of rape is carnal knowledge of a woman by force or intimidation and against her will or without her consent.[19] As the Court held in *People of the Philippines v. XXX*:[20]

> The crime of rape becomes qualified when the victim[-survivor] is under 18 years of age and the offender is a parent, ascendant, step-parent, guardian, relative by consanguinity or affinity within the third civil degree, or the common-law spouse of the parent of the victim-survivor. Thus, the elements of [q]ualified [r]ape are: (1) sexual congress; (2) with a woman; (3) done by force and without consent; (4) the victim[-survivor] is under 18 years of age at the time of the rape; and (5) the offender is a parent (whether legitimate, illegitimate or adopted) of the victim[-survivor].[21] (Citations omitted)

In rape committed by close kin, such as the victim-survivor's father, stepfather, uncle, or the common-law spouse of her mother, it is not necessary that actual force or intimidation be employed; moral influence or ascendancy

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18 *Id.* at 713.

19 *See People v. Masubay*, 881 Phil. 562, 573 (2020) [Per J. Reyes, Jr., First Division].

20 945 Phil. 225 (2023) [Per J. Hernando, First Division].

21 *Id.* at 233.

takes the place of violence or intimidation.[22] In *People of the Philippines v. AAA*,[23] the Court categorically declared that "[t]he moral ascendancy of the common law father of a minor substitutes force and intimidation in rape. When the offender has moral ascendancy over the victim-survivor, physical resistance no longer needs to be proven."[24]

The prosecution successfully established all the elements of rape and XXX271812's identity as the assailant. He had sexual intercourse with AAA271812. At that time, she was a minor, being born sometime in October 2003. During her testimony, AAA271812 positively identified her assailant and provided a detailed account of how he raped her. As CCC271812's common-law spouse, XXX271812 had moral ascendancy over AAA271812. Pursuant to standing jurisprudence,[25] this moral ascendancy over the victim-survivor substituted the element of force, threat and intimidation. She testified that he pulled her aside, removed her shorts and underwear, forcibly inserted his penis into her vagina, and threatened to kill her if she reported the incident.

In her Sworn Statement,[26] AAA271812 recounted the incident, narrating as follows:

> 4. Q: Why are you complaining [sic] your mother[,] [CCC271812,] and your stepfather[,] XXX271812?
> A: My mother beat me using a firewood while my stepfather sexually molested [me], Ma'am.
>
> 5. Q: How did the suspect (XXX271812) sexually molested [sic] you?
> A: He raped me, Ma'am.
>
> 6. Q: Where did the incident happen?
> A: Inside the house of [BBB271812], younger brother of [XXX271812] (suspect) at [redacted], [redacted], Ifugao where we are temporary [sic] residing, Ma'am.
>
> 7. Q: When did the incident happen?
> A: Sometime on [sic] August 2018, Ma'am.
>
> 8. Q: Will you please narrate on [sic] how XXX271812 raped you?
> A: Sometime on [sic] August 2018, I and my siblings were on deep sleep when my stepfather pulled me outside the house and there he raped me by removing my short pant[s] and panty, put down me [sic] to the ground and inserted his penis into my vagina, Ma'am.
>
> 9. Q: What happened next[,] if any?
> A: After he raped me, he held my neck tightly, pointed to me his knife and threatened to kill me if I will reveal the incident to anyone, Ma'am.

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22 *See People v. Corpuz*, 597 Phil. 459, 467 (2009) [Per J. Carpio Morales, Second Division].
23 950 Phil. 830 (2024) [Per J. Leonen, Second Division].
24 *Id.*
25 *People of the Philippines v. AAA*, 950 Phil. 830 (2024) [Per J. Leonen, Second Division].
26 RTC records, pp. 4–5.

10. Q: Are [sic] there anyone inside the house who noticed the incident?
A: None[,] Ma'am[.] [A]ll of them were on deep sleep.[27]

Affirming her sworn statement, AAA271812 once more described the harrowing experience she went through in the hands of XXX271812 in open court—

Q In 2018[,] [AAA271812,] you lived with [XXX271812] and [CCC271812], is that correct?
A Yes, sir.

Q And you lived with them at [redacted], [redacted], Ifugao, [is] that correct?
A Yes, sir.

Q And now[,] [AAA271812,] do you know that XXX271812 is imprisoned?
A Yes, sir.

Q He is imprisoned because you filed a case against him[,] do you know that?
A Yes, sir.

Q Why did you file a case against him, [M]adam witness?
A Because he is not good.

Q You are saying that he is not good, you mean he did something to you?
A Yes, sir.

Q What was that, Madam witness?
A [*Binastos*] po ako.

Q Saying [*binastos*], how did he [*bastos]*you, [AAA271812]?
A [*Ginalaw*] po.

Q When you say [*ginalaw*], then could you tell what [] [XXX271812] do [sic] to you when you say [*ginalaw*]?
A He removed my short pant[s] and underwear and inserted his penis to[sic] my vagina, sir.

Q Where did he do that [AAA271812]?
A At [redacted][,] inside the house, sir.

Q Whose house is that, [AAA271812]?
A My tita, sir.

Q Is that the place where you are [sic] staying during that time?
A Yes, sir.

Q Could you please recall the date[,] [AAA271812], when did that happen? [sic]

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27 *Id.* at 4.

A No, sir.

Q Would that be sometime in August 2018, [AAA271812]?
A Yes, sir.[28]

Anent AAA271812's age, the Court laid down the following controlling guidelines in appreciating age, either as an element of the crime or as a qualifying circumstance:

> In order to remove any confusion that may be engendered by the foregoing cases, we hereby set the following guidelines in appreciating age either as an element of the crime or as a qualifying circumstance.
>
> 1. The best evidence to prove age of the offended party is an original or certified true copy of the certificate of live birth of such party.
> 2. In the absence of a certificate of live birth, similar authentic documents, such as baptismal certificate and school records which show the date of birth of the victim[-survivor], would suffice to prove age.
> 3. If the certificate of live birth or authentic document is shown to have been lost or destroyed or otherwise unavailable, the testimony, if clear and credible, of the victim[-survivor]'s mother or a member of the family either by affinity or consanguinity who is qualified to testify on matters respecting pedigree such as the exact age or date of birth of the offended part pursuant to Section 40, Rule 130 of the Rules on Evidence shall be sufficient under the following circumstances:
>   a. If the victim[-survivor] is alleged to be below [three] years of age and what is sought to be proved is that she is less than [seven] years old;
>   b. If the victim[-survivor] is alleged to be below [seven] years of age and what is sought to be proved is that she is less than 12 years old;
>   c. If the victim[-survivor] is alleged to be below 12 years of age and what is sought to be proved is that she is less than 18 years old.
> 4. In the absence of a certificate of live birth, authentic document or the testimony of the victim[-survivor]'s mother or relatives concerning the victim[-survivor]'s age, the complainant's testimony will suffice provided that it is expressly and clearly admitted by the accused.
> 5. It is the prosecution that has the burden of proving the age of the offended party. The failure of the accused to object to the testimonial evidence regarding age shall not be taken against him.[29]

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[28] TSN, AAA271812, September 23, 2019, pp. 5–6. *See also* RTC records, pp. 58–59.

[29] *People of the Philippines v. XXX*, 898 Phil. 346, 357–358 (2021) [Per J. J. Lopez, Third Division], *citing People v.* Sariego, 781 Phil. 659, 670 (2016) [Per J. Peralta, Third Division], *citing further People v. Pruna*, 439 Phil. 440, 470–471 (2002) [Per C.J. Davide, Jr., *En Banc*].

Here, AAA271812's certificate of live birth was not presented because she had no birth certificate.[30] Consequently, CCC271812's testimony that AAA271812 was born on [redacted] is sufficient to prove the latter's age. Thusly, AAA271812 was around 14 years old at the time of the commission of the rape.

As earlier adumbrated, both courts *a quo* found that the prosecution sufficiently established all the elements of rape. They also concurred in the finding that AAA271812's testimony was credible. Hence, this Court finds no cogent reason to depart from their factual findings.

Assessment of the Victim-Survivor's Credibility vis-à-vis the Accused's Defense of Denial

XXX271812 contends that (1) AAA271812's testimony was not corroborated by any other evidence; (2) it is unnatural for her siblings to have not been awoken; (3) there are no bruises on her neck; (4) she did not shout during or after the incident; (5) it took about a month for her to report the incident; and (6) her testimony is riddled with inconsistencies.

The contentions are out on a limb.

First, there is no legal requirement that the testimony of a child victim-survivor in rape cases be corroborated by other evidence. The prosecution is not obliged to present a specific number of witnesses, and the testimony of a single credible witness may suffice for conviction. In *People v. Quinto*,[31] the Court held that "[i]t is axiomatic that witnesses are weighed, not numbered, and the testimony of a single witness may suffice for conviction if otherwise trustworthy and reliable for there is no law which requires that the testimony of a single witness needs corroboration except where the law expressly mandates otherwise."[32] In other words, AAA271812's testimony during the course of the trial as the sole eyewitness to the whole event should not by itself diminish her credibility.

Second, the Court cannot subscribe to XXX271812's argument that rape could not have occurred simply because it was committed in a place or at a time that seemed unnatural. Rape can be committed in places where people congregate, in parks, along the roadside, within school premises, inside a house where there are other occupants, and even in the same room where other members of the family are sleeping.[33] The presence of other people does not deter the commission of rape, for lust is no respecter of time and place.[34]

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30 TSN, CCC271812, March 17, 2021, pp. 8.
31 873 Phil. 679 (2020) [Per J. J. Reyes, Jr., First Division].
32 *Id.* at 690.
33 *See People v. XXX*, 882 Phil. 875, 886 (2020) [Per J. J. Reyes, Jr., First Division].
34 *See People of the Philippines v. Viñas*, 901 Phil. 285, 294 (2021) [Per J. Leonen, Third Division].

Third, it is settled that the absence of physical injuries, even fresh lacerations, does not negate rape.[35] It is of no moment that AAA271812 did not sustain any bruises when XXX271812 held her neck tightly, for it is not an element of rape. In any case, the Medico Legal Certificate which reveals a finding of healed hymenal lacerations on the 9 o'clock and 4 o'clock positions corroborates AAA271812's credible disclosure of sexual abuse.

Fourth, resistance is not an element of rape. A victim-survivor has no burden to prove that she did all within her power to resist the force or intimidation employed upon her.[36] *Lack of active resistance must never be equated to consent.* This is all the more true in cases where the victim-survivor of rape or sexual violence is a minor. Along this grain, the Court echoes its pronouncement in the case of *People of the Philippines v. XXX*[37]—

> Interestingly, children are often told to be wary of strangers, to cry or shout right away whenever they feel threatened. However, were children taught how to respond when the peril comes from a person so familiar, including their father? In such a situation, should their silence, accommodation, or helplessness be deemed inconsistent to what is normal?
>
> We may have to adjust our perspective and try to see things from the eyes of child victim[-survivor]s. Actions which we commonly see as strange and inconsistent to the norm may actually be seen by victim[-survivor]s as the only expected recourse or way out for them.
>
> Countless incestuous rape cases come before Us and the defense often attacks the credibility of the victim[-survivor]s based on their "inconsistent" responses to what is "normal." This is not only diabolical but absurd as well. There is a need to correct our minds that these are not actually strange nor inconsistent but the normal course of action on the part of children who are victim[-survivor]s of sexual abuse.[38]

Fifth, delay or failure to immediately report rape does not by itself cast doubt on the credibility of the victim-survivor or negate the commission of the crime. Delay in reporting rape incidents, in the face of threats of physical violence, cannot be taken against the victim-survivor because it is not an indication of a fabricated charge and does not necessarily cast doubt on the credibility of the complainant.[39]

Lastly, minor inconsistencies in the testimony of a child victim-survivor do not impair credibility, especially when these inconsistencies refer to trivial matters that do not alter the essential fact of the commission of rape. *People v. Morante*[40] elucidates—

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35 *See People v. Nical*, 754 Phil. 357, 364 (2015) [Per J. Reyes, Third Division].
36 *People v. Japson*, 743 Phil. 495, 503 (2014) [Per J. Reyes, Third Division].
37 945 Phil. 225 (2023) [Per J. Hernando, First Division].
38 *Id.* at 242–243.
39 *People v. Arcillo*, 790 Phil. 153, 160 (2016) [Per J. Perez, Third Division].
40 699 Phil. 575 (2012) [Per J. Leonardo-De Castro, First Division].

> Due to its intimate nature, rape is usually a crime bereft of witnesses, and, more often than not, the victim[-survivor] is left to testify for herself. Thus, in the resolution of rape cases, the victim[-survivor]'s credibility becomes the primordial consideration. It is settled that when the victim[-survivor]'s testimony is straightforward, convincing, and consistent with human nature and the normal course of things, unflawed by any material or significant inconsistency, it passes the test of credibility, and the accused may be convicted solely on the basis thereof. Inconsistencies in the victim[-survivor]'s testimony do not impair her credibility, especially if the inconsistencies refer to trivial matters that do not alter the essential fact of the commission of rape. The trial court's assessment of the witnesses' credibility is given great weight and is even conclusive and binding.[41]

The inconsistencies referred to by XXX271812 did not pertain to the rape itself but matters merely incidental to it. These are trivial matters, for AAA271812 was steadfast in her testimony on how XXX271812 committed the debauchery against her. At any rate, jurisprudence dictates that the factual findings of the RTC are entitled to the highest degree of respect and will not be disturbed on appeal.[42] Likewise, the assessment of a witness's credibility is best left to the trial court, as it has the unique opportunity to observe the demeanor, conduct, and attitude of the witnesses during their testimonies.[43]

In *People of the Philippines v. Santiago*,[44] the Court emphasized that the trial court's assessment of a witness's credibility is accorded great respect because it is in the best position to evaluate them through firsthand observation of the witness's behavior and manner of testifying.[45] Similarly, in *People v. Ampo*,[46] the Court reiterated that the trial court can better determine a witness's credibility because it is in the ideal position to weigh conflicting testimonies.[47]

In a forlorn attempt to evade criminal liability, XXX271812 raises the defense of denial. However, it is well-settled that denial is an inherently weak defense which must be substantiated by strong evidence of non-culpability to merit credibility. As repeatedly held, an unsubstantiated denial is a self-serving assertion that deserves no weight in law.[48] XXX271812's claim that he was ill cannot prevail over AAA271812's positive, candid, and categorical testimony, which unequivocally pointed to him as the perpetrator of the crime committed upon her.

Penalty for the Crime
and Award of Damages

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41 *Id.* at 585; *citing People v. Dion*, 688 Phil. 333, 348 (2011) [Per J. Leonardo-De Castro, First Division].
42 *See People v. PO1 Lumikid*, 875 Phil. 467, 480 (2020) [Per C.J. Peralta, First Division].
43 *See People v. Elimancil*, 846 Phil. 186, 195–196 (2019) [Per J. Peralta, Third Division]; *citing People v. Castel*, 593 Phil. 288, 315–316 [Per J. R.T. Reyes, *En Banc*].
44 898 Phil. 858 (2021) [Per J. Hernando, Third Division].
45 *Id.* at 870.
46 848 Phil. 97 (2019) [Per J. Peralta, Third Division].
47 *Id.* at 106–107.
48 *See People of the Philippines v. Amper*, 904 Phil. 610, 624 (2021) [Per J. J. Lopez, Third Division].

Although AAA271812's minority and relationship to the assailant were sufficiently proven by the prosecution, these circumstances cannot be appreciated as only minority was alleged in the Information. The Court, thus, upholds XXX271812's conviction for rape through force or intimidation under Article 266-A, paragraph 1 of the Revised Penal Code, but modifies the penalty by deleting the phrase "without eligibility for parole." The Court also finds it proper to modify the awards of civil indemnity, moral damages, and exemplary damages from PHP 100,000.00 to PHP 150,000.00 each, consistent with prevailing jurisprudence.[49]

As noted by Associate Justice Maria Filomena D. Singh, while minority and relationship cannot be appreciated to qualify the crime, the evidence on record nevertheless established that the victim was a minor and that the accused stood in a parental relationship to her. These circumstances, having been proven during trial, justify the award of increased civil indemnity and damages, in line with recent jurisprudence recognizing the heightened psychological and emotional harm suffered by child victims of sexual abuse committed by a parental figure.

Finally, as part of the government's efforts to provide comprehensive services to meet the needs of rape victims and their families, the Court directs the Department of Social Welfare and Development, through Branch [redacted], Regional Trial Court, [redacted], Ifugao, to refer AAA271812 to the proper rape crisis center for necessary assistance. Such assistance may include (1) providing her psychological counseling, medical and health services, including medico-legal examination; (2) ensuring her privacy and safety; (3) providing psychological counseling and medical services whenever necessary for her family; and (4) adopting and implementing programs for her recovery.[50]

FOR THESE REASONS, the Appeal is **DISMISSED**. The July 5, 2023 Decision of the Court of Appeals in CA-G.R. CR-HC No. 16035 is **AFFIRMED with MODIFICATION**. Accused-appellant XXX271812 found **GUILTY** beyond reasonable doubt of the crime of rape through force or intimidation under Article 266-A, paragraph 1 of the Revised Penal Code.

Accused-appellant XXX271812 is **SENTENCED** to suffer the penalty of *reclusion perpetua*. Moreover, he is **ORDERED to PAY** AAA271812 the following amounts: (1) PHP 150,000.00 by way of civil indemnity; (2) PHP 150,000.00 by way of moral damages; and (3) PHP 150,000.00 by way of exemplary damages, all with interest at the legal rate of 6% per annum from the date of finality of this Decision until fully paid.

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49 *People v. ABC260708*, 950 Phil. 199, 235 (2024) [Per J. M. Lopez, *En Banc*].

50 Republic Act No. 8505 (1998), Rape Victim Assistance and Protection Act of 1998, sec. 3.

The Department of Social Welfare and Development, through Branch [redacted], Regional Trial Court, [redacted], Ifugao, is **DIRECTED to REFER** AAA271812 to the appropriate rape crisis center for the necessary assistance to be rendered to her and her family, in line with Republic Act No. 8505, or the Rape Victim Assistance and Protection Act of 1998.

SO ORDERED."

JAPAR B. DIMAAMPAO
Associate Justice

WE CONCUR:

ALFREDO BENJAMIN S. CAGUIOA
Associate Justice

HENRI JEAN PAUL B. INTING
Associate Justice

SAMUEL H. GAERLAN
Associate Justice

MARIA FILOMENA D. SINGH
Associate Justice

CERTIFICATION

Pursuant to Article VIII, Section 13 of the Constitution, I certify that the conclusions in the above Decision had been reached in consultation before the case was assigned to the writer of the opinion of this Court.

ALFREDO BENJAMIN S. CAGUIOA
Acting Chief Justice
Per Special Order No. 3266
dated February 20, 2026