

Title: **\*\*Patulot v. People of the Philippines\*\***

Facts:

Evangeline Patulot was convicted on two counts of child abuse under Republic Act No. 7610 (Special Protection of Children Against Abuse, Exploitation, and Discrimination Act) by the Regional Trial Court (RTC) of Pasig City, Branch 163, Taguig City Station, for an incident dated November 14, 2012, in Taguig City, Philippines. Patulot was accused of throwing boiling oil at CCC, which accidentally hit CCC's children, three-year-old AAA and two-month-old BBB, causing them physical injuries. Patulot, having pleaded not guilty, her defense was that the hot oil was intended for CCC following a verbal altercation and not the children, who were accidentally hit. After the RTC's ruling, the Court of Appeals affirmed with modification the decision of the lower court, citing no reason to deviate from the RTC's findings but clarified the necessity of intent in crimes under special laws, except that Patulot's intent to harm CCC indirectly fulfills the requirement of intent harming the children.

Issues:

The issues before the Supreme Court were:

1. Did the Court of Appeals err in affirming Patulot's conviction of violating Section 10(a) of R.A. 7610 despite Patulot's contention of no intent to harm the complainant's children?
2. Did the Court of Appeals err in not applying Article 49 of the Revised Penal Code regarding the imposition of the penalty?

Court's Decision:

The Supreme Court denied the petition, affirming the decisions of the lower courts with the addition of an imposition of a six percent interest per annum on the actual and moral damages awarded, computed from the decision's finality until full payment. The Supreme Court clarified that child abuse under R.A. No. 7610 incorporates physical abuse regardless of the perpetrator's intent to harm the child specifically. The Court distinguished this case from others by the direct act of throwing boiling oil which resulted in physical injuries to the children, fitting within the statutory definition of child abuse and setting aside Patulot's argument regarding the absence of intent to harm the children specifically.

Doctrine:

This case reiterated the doctrine that under the Special Protection of Children Against Abuse, Exploitation, and Discrimination Act, an act constitutes child abuse if it results in physical or psychological harm to the child, regardless of the perpetrator's specific intent

towards the child. Intent to commit a different crime (in this instance, harm towards another adult) does not absolve the perpetrator from liability for the consequences of the act that result in child abuse.

Class Notes:

- R.A. No. 7610 provides broad protection against child abuse, exploitation, and discrimination, including physical and psychological harm.
- The specific intent to harm a child is not a requisite element for a conviction under child abuse; what is material is the resulting harm.
- Under Philippine law, a person may be held liable for the unintended consequences of their unlawful actions (doctrine of *aberratio ictus*).
- Actual and moral damages awards are subject to a six percent interest per annum from the judgment's finality until full payment, aligning with recent jurisprudence for compensating the victims.

Historical Background:

This case underscores the vigorous stance of Philippine laws and courts against child abuse, emphasizing the state's role in protecting children's rights and welfare. The enactment of R.A. No. 7610 reflects the Philippines' commitment to upholding children's rights as enshrined in both domestic and international legal frameworks. The decision in *Patulot v. People* further solidifies the legal principle that the protection of children against abuse is of paramount concern, extending liability even to those actions not initially intended to harm the child but resulting in such harm nonetheless.