

Title: Acharon vs. People of the Philippines: A Reinterpretation of Financial Support and Emotional Anguish under the Anti-VAWC Law

Facts: This case revolves around Christian Pantonial Acharon, who was convicted by the Regional Trial Court (RTC) of Valenzuela City and the decision subsequently affirmed by the Court of Appeals (CA) for violating Section 5(i) of the Republic Act No. 9262 (Anti-Violence Against Women and Their Children Act, or VAWC Law), by allegedly causing mental or emotional anguish to his wife, identified as AAA, through denying financial support. AAA and Christian married on September 30, 2011, and six days post their wedding, Christian left for employment in Brunei.

According to AAA's testimony, they agreed that Christian would send monthly remittances for a loan they acquired, which he failed to fulfill in totality. This inability to fully remit the payments for their loan caused her embarrassment toward their creditor, further exacerbated by Christian's alleged infidelity and indifference to their marriage, causing her profound emotional anguish.

Christian, defending himself, explained that his failure to provide complete financial support was not deliberate but due to unforeseen financial burdens such as an apartment fire and a vehicular accident in Brunei, alongside the stipulation of altered terms in his employment contract reducing his basic salary.

Despite Christian's defense, the RTC ruled against him, convicting him for violation of Section 5(i) of R.A. 9262. The CA upheld this decision, leading Christian to raise the matter to the Supreme Court.

Issues:

1. Whether Christian's failure to provide regular financial support and the alleged failure to maintain open communication lines with AAA constitute psychological violence under Section 5(i) of R.A. 9262.
2. Whether mere inability to provide financial support can be criminalized under the Anti-Violence Against Women and Their Children Act.

Court's Decision:

The Supreme Court granted the appeal and acquitted Christian, emphasizing two pivotal legal distinctions in the VAWC Law's interpretation.

1. On Psychological Violence: The court elucidated that for an act to constitute psychological violence under R.A. 9262, it must be proven that the accused willfully

engaged in conduct causing mental or emotional anguish to the victim. The act of failing to provide financial support does not inherently indicate willful intent to cause emotional suffering.

2. On Denial of Financial Support: Addressing the issue of financial support, the court distinguished between the “willful denial” and mere “inability” to provide such support, underlining that criminal liability under R.A. 9262 demands evidence of willful refusal for the purpose of inflicting emotional anguish.

Doctrine - The Supreme Court highlighted that not all failures or incapacities to provide financial support are punishable under R.A. 9262. To invoke criminal liability, there must be concrete evidence of a willful intent to cause emotional anguish, thereby inflicting psychological violence.

Class Notes:

1. Psychological Violence under R.A. 9262: Involves acts or omissions likely causing mental or emotional suffering to the victim, including threats, coercion, or harassment.
2. Financial Support in VAWC Cases: The denial or failure to provide financial support amounts to economic abuse only when it is proven to be a deliberate act to inflict psychological violence.
3. Essential Elements of a Crime: Comprises of actus reus (the criminal act) and mens rea (criminal intent). For R.A. 9262 violations, demonstrating the perpetrator’s intent to cause emotional distress is pivotal.

Historical Background - The Anti-Violence Against Women and Their Children Act (R.A. 9262) was enacted to protect women and children from physical, emotional, and psychological harm typically emanating from unequal power relations in domestic settings. This case underscores the necessity of proving intent to inflict psychological violence, particularly concerning financial support, shaping future interpretations and applications of the law towards ensuring the protection of victims without undermining the principles of justice and fairness.