

### Title:

Antonieta Lucido v. People of the Philippines: A Case of Child Abuse Under Republic Act No. 7610

### Facts:

In December 2007, in Barangay Atabay, Hilongos, Leyte, Antonieta Lucido, also known as "Tonyay," was accused of committing child abuse against an eight-year-old girl, identified as AAA, under Section 10(a) of Republic Act No. 7610 (the Special Protection of Children Against Abuse, Exploitation, and Discrimination Act). Lucido allegedly inflicted physical harm on AAA through beating with a belt, pinching, and strangulation. Lucido pleaded not guilty and was released on bail in July 2009 following arraignment and pre-trial procedures where her offer to plead guilty to a lesser offense was rejected by the prosecution.

Throughout the trial, the prosecution presented witnesses including AAA, Dr. Conrado Abiera III, the victim's father (FFF), and Maria Hinampas, to establish the series of abuses AAA suffered under Lucido's care. Lucido, in her defense, denied the allegations and presented her testimony alongside those of neighbors Lucia Mancio Lusuegro and Estrella L. Sanchez, arguing that the complaint was motivated by personal vendettas.

On June 27, 2011, the Regional Trial Court found Lucido guilty of child abuse and sentenced her to imprisonment and payment of moral damages. The Court of Appeals later affirmed this decision with modifications regarding the sentence and payment terms. Lucido's subsequent Motion for Reconsideration was denied.

### Issues:

1. Whether the Court of Appeals erred in sustaining Lucido's conviction despite asserted inadequacies in proving guilt beyond reasonable doubt.
2. Whether the Court of Appeals erred in classifying the committed acts as a violation of Republic Act No. 7610 instead of slight physical injuries.

### Court's Decision:

The Supreme Court of the Philippines denied Lucido's petition, affirming the decisions of both the Regional Trial Court and the Court of Appeals. The Court held that:

1. The factual basis of Lucido's guilt was not in error as presented by the lower courts, indicating that she was rightfully convicted based on substantial evidence of child abuse under Republic Act No. 7610.
2. The contention that the acts constituted only slight physical injuries was rejected in favor

of classification under Republic Act No. 7610, highlighting the seriousness of the abuse suffered by AAA, which included acts that were cruel and excessive and thus detrimental to the child's development.

### Doctrine:

This case reaffirmed the broad scope of actions punishable under Section 10(a) of Republic Act No. 7610, emphasizing that acts of child abuse need not directly prejudice the child's development to be prosecutable. It underscores the principle that the welfare of the child and protection from abuse are paramount, and that any act constituting physical or psychological abuse falls squarely within the ambit of the law.

### Class Notes:

- Child abuse under Republic Act No. 7610 includes acts that may physically or psychologically harm a child, whether habitual or not.
- The intent to debase or demean the child's dignity is not necessary for a child abuse conviction under the said Act, underscoring its *malum prohibitum* nature.
- Elements essential for the prosecution of child abuse include: the age of the child (below eighteen years), the act of abuse (physical, psychological, sexual, neglect, etc.), and the harm or potential harm to the child's well-being and development.
- Proof of prejudice to the child's development is not required for each act of abuse under the law, as the act itself constitutes a violation.

### Historical Background:

The legislative intent behind Republic Act No. 7610 reflects the Philippines' commitment to international conventions protecting children's rights and its constitutional mandate to safeguard children against abuse, exploitation, and discrimination. This case illustrates the judicial system's role in interpreting and enforcing laws aimed at protecting vulnerable children, reinforcing the state's duty to ensure a safe and nurturing environment for every child.