

Title: XXX vs. People of the Philippines

Facts:

The case revolves around XXX's violation of Section 5(e)(2) of RA 9262, known as the Anti-Violence Against Women and Their Children Act of 2004. XXX, the petitioner, was accused of deliberately depriving his wife, AAA, and their child, BBB, of sufficient financial support. The case unfolded with AAA's narrative, describing their short-lived marriage, XXX's inadequate provision during her pregnancy, and his subsequent negligence towards BBB's medical and educational needs. Despite AAA's efforts to secure support for BBB's special needs, including a hearing impairment, XXX allegedly evaded his financial responsibilities, leading to legal action initiated by AAA.

XXX refuted the accusations, presenting his version of their marital issues and claiming efforts to support BBB amidst constrained financial circumstances. The Regional Trial Court (RTC) found XXX guilty, a decision upheld by the Court of Appeals (CA). The litigation journey from the RTC to the Supreme Court emphasizes the thorough examination of facts, evidence, and legal principles surrounding economic abuse under RA 9262.

Issues:

1. Whether XXX deliberately deprived his child of financial support, constituting economic abuse under RA 9262.
2. The relevance of XXX's financial capacity and intent in fulfilling his support obligations.
3. The consideration of malice or intent in cases of economic abuse under special laws like RA 9262.

Court's Decision:

The Supreme Court denied the petition, affirming the CA and RTC's findings. The court underscored that RA 9262 aims to address and penalize economic abuse, where failure to provide financial support constitutes a violation. It highlighted that the necessity for support, particularly for a child with special needs, is paramount and should not be compromised by parental disputes. The Court also clarified that under special laws like RA 9262, the act of deprivation itself, irrespective of malice or intent, amounts to economic abuse. Thus, it confirmed XXX's guilt based on the sustained failure to provide necessary support to BBB.

Doctrine:

The case reaffirms the doctrine under RA 9262 that economic abuse entails not just the act

of withholding financial support but also making the victim financially dependent, which is considered a form of violence against women and their children. It also elucidates that for crimes under special laws, the determination of guilt does not hinge on the perpetrator's intent or malice but rather on the commission of the prohibited act.

Class Notes:

- Economic abuse under RA 9262 includes depriving or threatening to deprive financial support legally due to women or their children.
- The best interest of the child prevails over any parental conflict.
- In special laws like RA 9262, the focus is on the commission of the act (*malum prohibitum*) rather than the perpetrator's intent or malice, differing from crimes that are inherently wrong (*malum in se*).

Historical Background:

The case exemplifies the legal framework established by RA 9262 to protect women and children against different forms of abuse, including economic abuse. It reflects societal acknowledgment of the subtle yet impactful forms of violence that can occur within domestic settings, underlining the state's commitment to safeguarding vulnerable populations through comprehensive legislation.