

Title: Karlo Angelo Dabalos y San Diego v. Regional Trial Court, Branch 59, Angeles City, et al.

Facts:

Karlo Angelo Dabalos was charged under Section 5(a) of Republic Act (RA) No. 9262, also known as the “Anti-Violence Against Women and Their Children Act of 2004” by the Regional Trial Court (RTC) of Angeles City, Branch 59. The Information accused Dabalos of using personal violence against his former girlfriend, ABC, by pulling her hair, punching her back, shoulder, and left eye on July 13, 2009, thereby degrading her worth and dignity. The RTC, after evaluating the supporting evidence, issued a warrant of arrest on November 19, 2009. Dabalos posted bail for provisional liberty and subsequently filed a Motion for Judicial Determination of Probable Cause with Motion to Quash the Information, arguing that at the time of the incident, their dating relationship had concluded, purportedly making RA 9262 inapplicable. The RTC denied his motion, highlighting that the past dating relationship sufficed under RA 9262 to constitute violence against women.

Issues:

1. Whether the RTC has jurisdiction over the offense.
2. Whether RA 9262 should be interpreted in favor of the accused when ambiguity exists.
3. Whether the Information, which asserts a fact contrary to admissions, should be quashed.

Court’s Decision:

The Supreme Court dismissed the petition, affirming the RTC’s orders. The Court clarified that RA 9262 covers acts of violence against women with whom the offender has or had a sexual or dating relationship, regardless of whether the act of violence was a result of that relationship. It further reiterated that there is no ambiguity in RA 9262 that would necessitate a lenient construction in favor of the accused. The legislative intent is to impose a severe sanction on offenders who inflict physical harm on women with whom they have or had a romantic relationship, to enhance the protection of women and children. Thus, the Court concluded that the offense as alleged is within the purview of RA 9262 and falls under the jurisdiction of the RTC.

Doctrine:

The Supreme Court reiterated the doctrine that acts of violence against women and their

children, committed by persons who have or had a sexual or dating relationship with the victim, are punishable under RA 9262. The relationship's subsistence or cessation at the time of the act is inconsequential, provided that evidence of such a relationship's past or present existence is established. The Court also highlighted the principle that statutory ambiguity in favor of leniency (*in dubio pro reo*) does not apply when the law is clear.

Class Notes:

- **Elements of Violence Against Women under RA 9262**: (1) The offender has or had a sexual or dating relationship with the offended woman; (2) The offender commits an act or series of acts of physical violence; (3) These acts result in or likely result in physical harm or suffering.
- **Jurisdiction**: The Regional Trial Court has jurisdiction over cases of violence against women and their children as mandated by Section 7 of RA 9262.
- **Rule of Lenity**: This principle is applied only when there is genuine ambiguity in the statutory language that could lead to multiple interpretations. It was deemed not applicable to RA 9262 due to the law's clarity regarding its scope and application.

Historical Background:

RA 9262, known as the "Anti-Violence Against Women and Their Children Act of 2004", was enacted in response to increasing awareness and concern over violence against women and children in the Philippines. It aims to provide legal protection by criminalizing various forms of violence within personal relationships, underscoring the Philippine legal system's commitment to upholding human dignity against violence and abuse.