

Case Title:

XXX261920 vs. People of the Philippines

Facts:

Initial Events and Charges:

- Petitioner XXX261920 was charged with two counts of violating Section 5(i) of the Anti-Violence Against Women and their Children Act of 2004 (RA 9262).
- **Criminal Case No. 13025**: For allegedly causing psychological and emotional anguish by giving insufficient financial support.
- **Criminal Case No. 13026**: For allegedly causing psychological and emotional anguish by ordering his wife AAA261920 and their two-year-old daughter out of their conjugal house.

Prosecution Version:

- **2002**: Petitioner and AAA261920 were married, and they had two children.
- **2007-2014**: While AAA261920 worked abroad, the petitioner took their child to Mindanao without consent, leading her to suffer from depression.
- **2014**: AAA261920 returned to the Philippines.
- **May 29, 2017**: After a quarrel over finances, petitioner allegedly ordered AAA261920 and their younger child out of their home.
- **December 11, 2017**: An agreement was made for PHP 5,000.00 monthly support.
- **January 12, 2019**: Petitioner's actions of abandoning their child on the road added to AAA261920's emotional stress.
- A psychologist testified that AAA261920 suffered from severe depression caused in part by repeated maltreatment from the petitioner.

Defense Version:

- Petitioner claimed he had been giving the agreed PHP 5,000.00 monthly support and denied the insufficiency or eviction charges.
- Asserted that the quarrel over finances led AAA261920 to leave voluntarily.

Trial Court's Rulings:

1. **Criminal Case No. 13025**: Petitioner was acquitted due to insufficient evidence of deliberate financial support deprivation.
 2. **Criminal Case No. 13026**: Petitioner was found guilty and sentenced accordingly.
- The court recognized the history of abuse and the psychological toll on AAA261920,

verified by psychological assessments and testimonies.

Court of Appeals: Affirmed the trial court's decision on both issues; denied reconsideration.

Issues:

1. **Jurisdiction:**

- Whether the trial court in La Union had jurisdiction considering both parties resided in Pangasinan.

2. **Sufficiency of Evidence:**

- Whether there was enough evidence to support the allegation that petitioner inflicted psychological and emotional anguish by ousting his wife and child from their home.

3. **Mens Rea (Guilty Mind):**

- Whether the prosecution sufficiently proved the intent to cause psychological and emotional harm.

Court's Decision:

1. Jurisdiction:

- The court implicitly rejected the jurisdictional issue by addressing the case on its merits. It held that discussing jurisdiction was unnecessary once the elements of the crime were established.

2. Sufficiency of Evidence:

- The Supreme Court found that the lower courts' focus was improperly broad, considering the pattern of abuse rather than the specific ousting incident in May 2017.
- The Psychological Assessment Report did not confine findings to the May 2017 ousting incident, leading to uncertainty about the cause of AAA261920's Major Disorder.

3. Mens Rea:

- Court emphasized that criminal intent must be proven for Section 5(i) violations of RA 9262.
- Petitioner's act of ousting his wife and child was attributed to a quarrel and lost temper over finances, not a deliberate intent to cause psychological harm.

Acquittal:

- The Supreme Court ruled in favor of the Petitioner, stating the evidence failed to unequivocally link the alleged harm to the May 2017 incident specifically and lacked proof of the necessary criminal intent.

Doctrine:

- ****In Dubio Pro Reo****: Legal principle requiring acquittal where evidence admits alternative interpretations, meaning any reasonable doubt should benefit the accused.
- ****Mens Rea in RA 9262****: Proof of criminal intent is essential in prosecuting psychological violence under Section 5(i).

Class Notes:

- ****Key Elements of Section 5(i) RA 9262****:
 1. ****Offended Party****: Woman and/or her child.
 2. ****Relationship****: A wife or former wife, woman with a mutual child, or one in a dating relationship.
 3. ****Mental or Emotional Anguish****: Needs to be proven.
 4. ****Actus Reus****: Act causing the anguish, e.g., denial of support, eviction.
 5. ****Mens Rea****: Intent to cause harm.
- ****Application****: Courts require clear evidence linking the specific act to alleged psychological harm and must ascertain the intent behind such acts.

Historical Background:

- ****RA 9262****: Enacted to protect women and children from violence, reflecting the Philippines' commitment to human rights and equality.
- ****Judicial Interpretation****: RP courts have moved to clarify necessary elements and evidentiary standards for convictions under RA 9262, focusing particularly on the necessity for criminal intent and concrete linkage between actions and psychological harm.

This case highlights the judiciary's rigorous standards in proving abuse allegations under special laws.