

**Title:** XXX256611 vs. People of the Philippines

**Facts:**

- **2009:** Continuous deprivation of financial support by XXX256611 to his children with AAA256611.
- **August 28, 2008:** Agreement for a monthly allowance of P1,000.00 was made but inconsistently followed.
- **2010:** XXX256611 completely stopped financial support.
- **November 2013:** XXX256611 optionally retired, receiving substantial retirement benefits.
- **May 2014:** Promise to provide support upon receiving his benefits, which was not fulfilled.
- **October 31, 2014:** Information filed against XXX256611 for violation of Section 5(i) of RA 9262.
- **April 20, 2018:** Trial court (RTC Branch 94, Quezon City) convicted XXX256611 under Section 5(i) of RA 9262.
- **June 8, 2020:** Court of Appeals modified conviction to Section 5(e)(2), RA 9262.
- **February 23, 2021:** Motion for reconsideration by XXX256611 denied.
- **Present Petition:** XXX256611 challenges his conviction asserting his inability to provide support due to medical and financial constraints following a severe accident in 2012.

**Issues:**

1. Whether the deprivation of financial support by XXX256611 constituted a violation of Section 5(e)(2) of RA 9262.
2. Whether the willful or deliberate intent to control or cause mental anguish to AAA256611 and her children was established.
3. Applicability of the variance doctrine in differentiating Section 5(e) and Section 5(i) violations under RA 9262.

**Court's Decision:**

The Supreme Court acquitted XXX256611 based on the following analysis:

1. **Section 5(e)(2) of RA 9262:**

The Court emphasized that mere denial of financial support isn't sufficient for prosecution under Section 5(e). The denial must have the "purpose or effect of controlling or restricting the woman's...movement or conduct."

2. **Intent and Purpose:**

The court found no evidence establishing that XXX256611's refusal to provide financial support was meant to control AAA256611's actions or inflict psychological harm. The prosecution failed to prove the requisite mens rea - intention to control or cause anguish.

3. **Financial Inability:**

XXX256611's defense, supported by testimonies and records, showed he was financially incapacitated due to medical and loan obligations following his accident and subsequent severe health issues.

**Doctrine:**

The Supreme Court reiterated the necessity for willful intent in the denial of financial support under Section 5(e)(2) and Section 5(i) of RA 9262. The elements for violation under these sections include the need for evidence showing that the refusal of support was intended to control the woman's actions or cause mental or emotional anguish. The mere failure to provide support, due to incapacity, does not meet these criteria.

**Class Notes:**

- **RA 9262 Section 5(e)(2) and 5(i):**
- Sections penalize the deprivation of financial support with intent to control (Section 5(e)(2)) or to cause emotional anguish (Section 5(i)).
- Elements: Offended party must be a woman/child, the offender willfully refused or denied financial support, and the intent must be to control or inflict mental anguish.
- **Key Concepts:** Actus reus (illegal act) and mens rea (intent or purpose behind the act).
- **Case Application:** Significant in determining the necessity of intent behind financial denial in prosecutions under RA 9262.

**Historical Background:**

RA 9262, the "Anti-Violence Against Women and Their Children Act of 2004," was enacted to protect women and children from various forms of violence, including psychological, physical, and economic abuse. This specific case highlights ongoing legal interpretations of the act, particularly focusing on the intent required for violations related to financial support. The decision aligns with recent jurisprudence, such as the Acharon v. People case, refining the standards for proving such violations.