PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. XXX271087, ACCUSED-APPELLANT.

G.R. No. 271087, July 14, 2026

Ponente: LEONEN, SAJ.

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LEONEN, SAJ.:

A woman trapped in an abusive relationship cannot be expected to report every beating to the authorities or recount every traumatic memory in open court. Stigma, distrust of authorities, humiliation, and cultural pressures are some reasons that deter women from seeking help and push them to remain silent. Moreover, prolonged domestic abuse can cause victims to withdraw or dissociate leading to silence or even gaps in memory. This is how trauma operates. Courts must be careful not to demand an impossible standard of proof that is blind to the realities of abuse.[1]

This Court resolves an appeal[2] from the Decision[3] of the Court of Appeals affirming the Regional Trial Court's Decision[4] convicting accused-appellant XXX271087 of the crime of parricide.[5]

In a February 23, 2011 Information,[6] XXX271087 was charged with parricide. The accusatory portion of the Information reads:

> That on or about the 8[th] day of February 2011, in the City X Philippines, and within the jurisdiction of this Honorable Court, the said accused, did then and there willfully, unlawfully and feloniously, with intent to kill, shoot several times [AAA271087] with the use of 9mm pistol hitting him on the different parts of his body, the latter being his [sic] legitimate husband, thereby inflicting upon him fatal wounds which caused his immediate death.
>
> CONTRARY TO LAW.[7]

On arraignment, XXX271087 pleaded not guilty to the charges against her.[8] Thereafter, trial on the merits ensued.[9]

The prosecution presented the testimonies of three witnesses: BBB271087, victim AAA271087 sister-in-law; Police Officer II Sheryl Respicio (PO2 Respicio), the arresting officer; and CCC271087, AAA271087's mother.[10]

According to the prosecution, the crime started from an argument between XXX271087 and AAA271087. On February 8, 2011, at 9:00 p.m., while BBB271087 was in her home, she heard XXX271087 screaming as she was coming out of their house. XXX271087 then went to BBB271087 and proceeded to tell her that AAA271087 was having an outburst. BBB271087 went to the spouses' house and found AAA271087 with blood on his body. She asked AAA271087 what happened, but he did not respond. After making sure he was fine, BBB271087 returned to her house to tend to her store. A few moments later, she heard several gunshots coming from the spouses' house. She rushed towards the house and knocked on the door. When the door opened, she saw XXX271087 with a gun in her hand, telling her "mas gugustuhin ko nalang makulong, te" (I would rather be imprisoned). She saw

AAA271087's body on the floor covered in blood.[11]

Meanwhile, PO2 Respicio, the spouses' neighbor, allegedly heard several gunshots while inside her home. Alerted, she went to investigate where the gunshots came from and was informed that XXX271087 shot AAA271087. Upon arriving at the spouses' house, she found XXX271087 sitting on the sofa. XXX271087 told her that she accidentally shot AAA271087, saying "Ate nadisgrasya ko si [AAA271087]." She then arrested XXX271087 and brought her to the X City Police Station for further investigation.[12]

CCC271087 testified on the veracity of AAA271087's Certificate of Live Birth, the spouses' Certificate of Marriage, and AAA271087's Certificate of Death. AAA271087's Certificate of Death showed he suffered multiple gunshot wounds in the head, right upper extremity, thorax, abdomen, and right and lower extremities.[13]

On the other hand, the defense presented XXX271087[14] and interposed the defense of "battered wife syndrome."[15] The psychiatric report of Dr. Emeryl S. Layugan, (Dr. Layugan) a government psychiatrist,[16] and Dr. Ethel Maureen Pagaddu (Dr. Pagaddu), the doctor who assisted Dr. Layugan, was likewise presented.[17]

XXX271087 testified that she and AAA271087 had been married for 11 years and had three sons. The relationship soured when AAA271087 was assigned in X. She noticed that he started coming home at around 1:00 to 2:00 a.m. and heard rumors that he was seeing another woman.[18]

In one instance, XXX271087 followed AAA271087 and saw him board a female passenger on his motorcycle. At another time, she received an anonymous phone call informing her that AAA271087 was at a particular hotel, where she caught him in bed with another woman. AAA271087 restrained XXX271087 as the woman physically attacked her. Since this incident, AAA271087 became violent towards XXX271087. He would arrive home drunk and beat her with his bare hands for about four times a week.[19]

On a separate occasion, AAA271087 had choked XXX271087 and pointed a firearm at her when she told him she wanted to leave him. When she attempted to ask help from her neighbors, he threatened to kill her. Out of fear, XXX271087 did not file a complaint against AAA271087.[20]

On February 8, 2011, at 6:00 p.m., XXX271087 found AAA271087 shouting at their children. When he noticed her, AAA271087 started throwing objects around. He then picked up their two-year-old son and threw him on a chair. In response, XXX271087 picked up a ladle and struck him on the head. She then ran outside to ask help from BBB271087, who advised her to resolve the problem by talking to AAA271087. However, when she tried to talk to him, AAA271087 hurled obscenities at her.[21]

At 8:00 p.m., XXX271087 started packing her clothes to leave the house. AAA271087 saw this and threatened her that they would not get out of the house alive. He then started beating her and slammed her head against a wall. This caused her vision to dim. XXX271087 claims that her memory went blank and when she regained consciousness, she was already at the police station.[22]

On January 21, 2020, the Regional Trial Court rendered its Decision[23] convicting XXX271087 of parricide:[24]

> WHEREFORE, judgment is hereby rendered finding accused [XXX271087] guilty beyond reasonable doubt of the crime of Parricide and is hereby sentenced to suffer the penalty of reclusion perpetua and to pay the heirs of the victim, [AAA271087] the amounts of P75,000.00 as civil indemnity, P75,000.00 as moral damages, P30,000.00 as exemplary damages, and P25,000.00 as temperate damages. In addition, all the monetary awards shall earn an interest at the legal rate of 6% per annum from the date of finality of this decision until fully paid.
>
> SO ORDERED.[25]

XXX271087 appealed the Regional Trial Court's Decision before the Court of Appeals.[26]

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In its assailed August 9, 2023 Decision,[27] the Court of Appeals affirmed, with modifications, the Regional Trial Court's Decision.[28]

The Court of Appeals found that the defense failed to discharge its burden in proving that XXX271087 acted in self-defense arising from battered woman syndrome.[29] Both the Regional Trial Court and Court of Appeals found that XXX271087 was unable to provide arty evidence demonstrating the concurrence of the three phases of the cycle of violence or supporting her claim that she went through multiple instances of abuse.[30]

The dispositive portion of the Court of Appeals' Decision reads:

> WHEREFORE, premises considered, the present appeal is DENIED. The assailed Decision dated 21 January 2020 rendered by the Regional Trial Court of X, X Judicial Region, Branch XXXX in Criminal Case No. 19-7211 convicting accused-appellant [XXX271087] of parricide, and ordering her to pay the heirs of [AAA271087], civil indemnity and moral damages in the amount of Php75,000.00 each, is hereby AFFIRMED WITH MODIFICATIONS in that in addition to all the damages awarded, the amount of exemplary damages is increased to Php75,000.00 and temperate damages is increased to Php50,000.00. The total amount of damages shall earn a legal interest of six percent (6%) per annum from the date of finality of this Decision until full payment thereof.
>
> SO ORDERED.[31] (Emphasis in the original)

Aggrieved, XXX271087 filed her Notice of Appeal,[32] which was given due course by the Court of Appeals.[33] The case records were thus elevated to this Court.

On August 27, 2024, this Court issued a Resolution[34] notifying the parties that they may file their respective supplemental briefs. The confinement of XXX271087 at the Correctional Institution for Women in Mandaluyong City since October 21, 2022 has also been confirmed.[35]

Both the Office of the Solicitor General, on behalf of the People of the Philippines,[36] and XXX271087, through her counsel from the Public Attorney's Office,[37] manifested that they would no longer file their supplemental briefs and would instead be adopting the briefs filed before the Court of Appeals.

In her Brief,[38] XXX271087 argues that the trial court erred in convicting her since she was afflicted with the battered woman syndrome, a lawful defense in the crime of parricide.[39] She presents the psychiatric evaluation report by government physician Dr. Layugan which she deems a public document due to being conducted pursuant to an order from the trial court and therefore, does not require authentication to be admitted as evidence.[40]

She posits that the psychiatric report shows how AAA271087 abused her, satisfying the requisites of the battered woman syndrome defense. According to XXX271087, she went through the cycle of violence twice. She claims that the second instance of acute battering happened when AAA271087 slammed her head against the wall, constituting unlawful aggression on his part. This propelled her to act not only in self-defense, but in defense of her children.[41]

Finally, she argues that the trial court misinterpreted facts, evidence, and jurisprudence when it ruled that XXX271087 is guilty of parricide. She argues that she had proven, through the psychiatric report, the abuse she had suffered under AAA271087's hands. She maintains that her account should have been given greater credence.[42]

On the other hand, in its Appellee's Brief,[43] the People, through the Office of the Solicitor General, argues that XXX271087's guilt was proven beyond reasonable doubt.[44]

It posits that there is no evidence establishing XXX271087's battered woman syndrome and maintains that there is doubt as to whether AAA271087 completed at least two cycles of violence. Even assuming that Dr. Layugan's psychiatric report was admissible, it maintains that there is no collateral evidence establishing XXX271087's theory of abuse.[45] Finally, it maintains that all the elements of the crime of parricide have been established by the prosecution.[46]

The sole issue for this Court's resolution is whether accused-appellant XXX271087 is guilty beyond reasonable doubt of parricide. Subsumed in this issue is whether the battered woman syndrome defense must be appreciated.

The appeal is with merit.

I

Accused-appellant was convicted of parricide under Article 246 of the Revised Penal Code, which provides:

> Article 246. Parricide. - Any person who shall kill his father, mother, or child, whether legitimate or illegitimate, or any of his ascendants, or descendants, or his spouse, shall be guilty of parricide and shall be punished by the penalty of reclusion perpetua to death.

Parricide is committed when: (1) a person is killed; (2) the deceased is killed by the accused; (3) the deceased is the father, mother, or child, whether legitimate or illegitimate, or any other legitimate ascendant or descendant, or. the legitimate spouse of the accused.[47]

In this appeal, accused-appellant admits that she indeed shot her husband.[48] The spousal relationship between the accused-appellant and the victim is undisputed, there being a valid marriage certificate,[49] as well as admission from accused-appellant herself.[50] Similarly, accused-appellant's participation in AAA271087's death has been clearly established by the testimonies of the prosecution witnesses.[51] Accused-appellant admits, in her testimony and brief before the Court of Appeals, that the emotional and physical abuse she suffered led her to end his life by shooting him with his own gun.[52] Her defense, is that she suffers from the battered woman syndrome.[53]

Battered woman syndrome was recognized by this Court in the landmark case of People v. Genosa[54] and was defined as a woman "who is repeatedly subjected to any forceful physical or psychological behavior by a man in order to coerce her to do something he wants her to do without concern for her rights."[55] It recognized the battered woman syndrome as a legitimate psychological condition arising from domestic abuse and characterized by the cycle of violence which has three phases: (1) the tension-building phase; (2) the acute battering incident; and (3) the nonviolent phase.[56] To be classified as a battered woman, the couple must go through the battering cycle at least twice.[57]

The tension-building phase is where tension and conflict begin to build in the relationship. The abuser becomes increasingly irritable, angry, and unpredictable. The woman may try to placate, avoid conflict, or stay out of the abuser's way to prevent an escalation. The woman may classify the abuse experienced here as only minor occurrences, leading to the worsening of the abuse.[58]

The acute battering incident is characterized by brutality and in the worst cases, death. This is when the tension reaches its breaking point, and the abuser releases the built-up tension through a violent, abusive outburst. This can include physical, sexual, and emotional abuse or other forms of aggression.[59]

The final phase involves the reconciliation phase. The abuser may apologize, express remorse, or promise never to hurt the victim again. They may shower the victim with affection, gifts, or attention to make up for the abuse. The victim, wanting to believe in the abuser's promises, may stay in the relationship.[60]

Genosa ruled that a claim of battered woman syndrome must be well-established and supported by firm evidence. To successfully invoke this defense, there are three requirements that must be met:

> First, each of the phases of the cycle of violence must be proven to have characterized at least two battering episodes between the appellant and her intimate partner. Second, the final acute battering episode preceding the killing of the batterer must have produced in the battered person's mind an actual fear of an imminent harm from her batterer and an honest belief that she needed to use force in order to save her life. Third, at the time of the killing, the batterer must have posed probable -- not necessarily immediate and actual -- grave harm to the accused, based on the history of violence perpetrated by the former against the latter. Taken altogether, these circumstances could satisfy the requisites of self-defense.[61]

The court recognized that prolonged battering could lead to learned helplessness which is described as "the battered woman's perceptions that she is helpless to stop the abuse and explains why she does not leave her abuser."[62] This creates a perception of imminent danger a battered woman may experience even in the absence of an active attack. However, for it to be a defense there must be clear evidence proving both the (1) the history of abuse[63] and (2) the psychological effect of the battery on the appellant.[64] Ultimately, the Court found that the appellant in Genosa failed to prove the existence of the syndrome.[65] Furthermore, it held that unlawful aggression, the most essential element for self-defense, was lacking since there was sufficient interval between the unlawful aggression of Ben and Marivic's fatal attack upon him. However, the Court considered the circumstances as mitigating, thereby reducing her penalty from death to prision mayor in its minimum period to reclusion temporal in its medium period.[66]

Prior jurisprudence set a high threshold for those invoking self-defense based on battered woman syndrome. Thus, to expand protections for victims of domestic abuse, Republic Act No. 9262, also known as the Anti-Violence Against Women and Their Children Act of 2004 was promulgated. Under the law, battered woman syndrome is codified and defined as, "a scientifically defined pattern of psychological and behavioral symptoms found in women living in battering relationships as a result of cumulative abuse."[67] While traditional self-defense requires the concurrence of three elements: (i) unlawful aggression; (ii) reasonable necessity of the means employed to prevent or repel it; and (iii) lack of sufficient provocation on the part of the person defending herself;[68] Section 26 of Republic Act No. 9262 expressly provides that a victim found suffering from battered woman syndrome shall not incur criminal and civil liability, even in the absence of any of the elements required. Section 26 reads:

> SECTION 26. Battered Woman Syndrome as a Defense. – Victim-survivors who are found by the courts to be suffering from battered woman syndrome do not incur any criminal and civil liability notwithstanding the absence of any of the elements for justifying circumstances of self-defense under the Revised Penal Code.
>
> In the determination of the state of mind of the woman who was suffering from battered woman syndrome at the time of the commission of the crime, the courts shall be assisted by expert psychiatrists/psychologists.

The legislative intent is unmistakable. Congress recognized that the lived realities of battered women do not always conform to the traditional paradigm of combat contemplated in the self-defense doctrine. Domestic violence occurs through a series of physical, sexual, and psychological harm, or economic abuse[69] that result in a pattern of psychological and behavioral symptoms. The sustained intimidation, coercion, and domination used on the woman instills a sense of fear and psychological entrapment.[70] Consequently, Section 26 does not demand that the battered woman wait for a fatal attack before acting in preservation of life. To insist otherwise is to ignore the cyclical nature of domestic violence that the law itself was enacted to address.

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II

Accused-appellant successfully satisfied the three phases required to establish battered woman syndrome. Records demonstrate that accused was not merely a spouse who had a quarrel with her husband. She was a woman repeatedly diminished by her partner through violence and intimidation.

The first cycle began its tension-building phase when AAA271087 became emotionally distant after his reassignment. He regularly came home at around two in the morning and rumors of infidelity started circulating. Accused-appellant started feeling anxious, suspicious, and distressed. Her husband's cold demeanor created an atmosphere of instability in the marriage. The violence escalated into the acute battering stage when on September 16, 2010,[71] she discovered AAA271087 in a hotel room with another woman and, instead of receiving remorse, was restrained while she was physically assaulted. She sustained serious injuries which required her to seek hospital treatment. Accused-appellant obtained a medical certificate[72] signed by Dr. Gay Ladylyn Azman on February 2, 2012 showing that she was brought to the hospital with the following diagnosis:

> Hematoma, frontal area, midline
> Hematoma, mandibular area, left
> Lacerated wound, palmar aspect, hand, left.[73]

While the accused-appellant did not mention that she received an apology from her husband, the fact that the marriage and cohabitation continued after the hotel incident indicates a reconciliation period between husband and wife. The "contrition or honeymoon phase" need not involve grand gestures of remorse but may sometimes consist of merely a temporary calm between the couple.

Thereafter, the abuse continued behind closed doors. This is where the second cycle of the tension building phase begins. AAA271087 repeatedly came home late and physically abused accused-appellant for no apparent reason.[74] The abuse persisted for over two years, yet accused-appellant remained with her husband. She did not seek police assistance because she feared retaliation and distrusted law enforcement due to her husband's position as a police officer. Her neighbors consisted of her sister-in-law and a colleague of her husband which heightened her isolation and prolonged her helplessness.

The final violent confrontation in February 2011 constitutes another acute battering episode. AAA271087 shouted at their children and violently threw their youngest child onto a chair. When accused-appellant intervened by striking him with a ladle, she was assaulted. She then ran outside to ask help from her sister-in-law BBB271087. Afterwards, accused-appellant returned to the house and remained there, completing another cycle.

Later that night, accused-appellant started packing her clothes to leave the house. AAA271087 saw this, threatened her, saying she would not get out of the house alive. He then started beating her and slammed her head against a wall causing her vision to blur. Afterwards, accused-appellant claims that her memory went blank and when she regained consciousness, she was already at the police station.[75]

In the present case, the defense successfully established that the accused-appellant underwent at least two full cycles of battered woman syndrome. Given the duration of the abuse and the severity of the assaults she had sustained, this Court finds that the violence perpetrated by AAA271087 against accused-appellant were not isolated incidents but a systemic pattern. This fundamentally altered accused-appellant's state of mind and caused her to have learned helplessness that led her to believe that only killing her husband would free her.

To validate this psychological state, the defense secured the psychiatric report of Dr. Layugan, a government psychiatrist,[76] who reported accused-appellant's narration of the circumstances of her marriage to AAA271087[77] and included a finding she suffered from major depressive disorder.[78] The defense also

brought in Dr. Pagaddu, who testified:

Q:

And this case involved the person of [XXX271087], do you know the person of [XXX271087]?

A:

Yes, sir.

Q:

How did you come to know her?

A:

She was brought to the Medical Center dated September 12, 2018, with the court order for her to undergo psychiatric examination, sir.

Q:

How many times did the accused report to your office?

A:

Three (3) times, sir.

Q:

On those three (3) times that the accused reported to your office, what did... and what were your activities, if any?

A:

She was subjected for several interview, she reported, she was also subjected for battery of psychiatric test, sir.

Q:

You mentioned of battery of psychiatric test, what do you mean?

A:

She was subjected for psychiatric examination, and it is reflected under Head Psychiatric Results.

Q:

And on these meetings or sessions with the accused, what did you find out?

A:

The patient was found out to be suffering from Major depressive [dis]order.

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Q:

As x x x a doctor for behavioral medicine, what do you think is the source of that disorder?

A:

Of course the formation or symptoms for multiple and biological going on inside the body of the person like decrease in the level of cerotomie, it could also be secondary to psychiatric factors like exposure to violence, abuse and several factors which includes relationship with people that the patient comes to deal with, sir.

Q:

So considering that you alleged that the accused is suffering from major depression disorder, how did you come up with that result?

A:

It is the result of the evaluation that was conducted concerning the kind of relationship that she had with [the] late husband considering that the symptoms of depression started when her relationship with her late husband became stormy.

Q:

What do you mean stormy?

A:

In the sense that physical, emotional and psychological abuse inflicted by the late husband to the patient.

Q:

And if a person is suffering from this disorder, what may be the consequence?

A:

It may last for years and or lifetime, the patient experiences hopelessness, worthlessness of the chaotic relationship that she was decreasing self-esteem, things that has responded to save the relationship or responsibility to transform the behavior of the abuser, [her] late husband.

Q:

Madam Witness in this case, the accused [XXX271087] is charged with parricide and at the time of the alleged incident time, do you think was it state of mind or mental condition of the accused.

A:

Based on the narration of the patient, there was this thing if the husband survived[,] she and her children will die, it is a self defense to save, who was the very reason why she remained with the chaotic relationship that she had with the late husband.[79]

As instructed in Genosa and codified in Section 26 of the Anti-Violence Against Women and Their Children Act,

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the Court can find assistance from expert psychologists or psychiatrists to determine the state of mind of the woman that may be suffering from battered woman syndrome. The testimony of the expert serves as the bridge that explains why the victim, or, in this case, accused-appellant, acted the way she did.

In testifying that accused-appellant's Major Depressive Disorder was a direct consequence of the physical, emotional, and psychological abuse she endured, Dr. Pagaddu showed that her actions were moved by self-preservation and desperation. After conducting multiple clinical interviews and a battery of psychiatric tests, the expert's findings established a clear causal link between the husband's "stormy" aggression and accused-appellant's compromised mental state. This demonstrates that accused-appellant's act was the breaking point of a victim trapped in a medically recognized cycle of violence. To her mind, shooting her husband was the only way she could finally bring an end to the cycle.

III

The Court of Appeals erred when it affirmed the lower court's decision to convict accused-appellant. It held that the psychological report and accused-appellant's own declarations were insufficient to support her claim of battered woman syndrome. The Court of Appeals further noted that there was a lack of corroborating testimonies from relatives, neighbors, or even her own children and no medical or police reports to present any pattern of physical abuse.

The Court of Appeals' high evidentiary requirement is misplaced.

Studies have shown that women in abusive relationships are unwilling to report violent instances due to a numerous of reasons including social stigma, lack of trust on authorities, humiliation, and cultural structures.[80] Accordingly, one cannot expect those trapped in the cycle of violence would be able to report every beating or recount every traumatic memory. Women subjected to prolonged domestic abuse may remain silent and forget details because the mind itself withdraws or disassociates to shield the victim from unbearable pain.[81] Courts must be careful not to demand an impossible standard of proof detached from the realities of abuse. This becomes even more compelling where, as here, the alleged abuser occupied a position of authority as a police officer. The accused's fear of reporting abuse to law enforcement cannot be dismissed as unreasonable.

This is consistent with the Philippines' obligations under the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), which recognizes gender-based violence as a form of discrimination and obligates courts and public institutions to endure the effective protection of women against such acts.[82] CEDAW General Recommendation No. 35 further instructs States to ensure that evidentiary rules are not influenced by gender stereotypes or unrealistic expectations regarding victim behavior.[83] It likewise notes that courts must abandon antiquated "application of preconceived and stereotypical notions of what constitutes gender-based violence against women, what women's responses to such violence should be and the standard of proof required to substantiate" it.[84]

Accordingly, the Court gives weight to the findings of the court-appointed psychologist who diagnosed the accused with major depressive disorder and who found that the abuse experienced by the accused-appellant in the hands of her husband as what moved her to inflict the fatal shots. While the expert may not have elicited a detailed catalogue of every prior assault, such limitation does not erase the broader truth reflected by the record.

The absence of exhaustive corroboration for every prior incident does not negate the existence of battered woman syndrome where the totality of the evidence, the documented injuries, the testimony regarding repeated abuse, the psychological findings, and the violent events immediately preceding the shooting, sufficiently establish a pattern of battering and coercive control.

Courts must interpret Republic Act No. 9262 with an awareness of the lived realities that compelled its enactment. The law was intended to protect women trapped in cycles of violence that conventional criminal doctrines did not consider. To deny the accused the protection of Section 26 simply because her abuse was not perfectly documented would be to impose upon battered women a burden the law itself never intended.

The Court therefore finds that the accused was suffering from battered woman syndrome at the time of the incident and is consequently exempt from criminal and civil liability pursuant to Section 26 of Republic Act No. 9262.

ACCORDINGLY, the appeal is GRANTED. The August 9, 2023 Decision of the Court of Appeals in CA-G.R. CR-HC No. 14921 is REVERSED AND SET ASIDE. Accused-appellant XXX271087 is ACQUITTED.

She is ordered immediately RELEASED from detention, unless she is confined for some other lawful cause.

Let a copy of this Decision be furnished to the Director General of the Bureau of Corrections for immediate implementation. The Director General of the Bureau of Corrections is directed to report the action he has taken to this Court within five days from receipt of this Decision.

Let entry of final judgment be issued immediately.

SO ORDERED.

Lazaro-Javier, Kho, Jr., and Villanueva, JJ., concur.
Lopez,[*] J., on leave.

[**] In line with Amended Administrative Circular No. 83-2015, as mandated by Republic Act No. 9262, the names of offended parties, along with all other personal circumstances that may tend to establish their identities, are made confidential to protect their privacy and dignity.

[*] On leave.

[1] Vito Zepinic, Battered Women Syndrome: A Headache for Medicine and Law, 12 PSYCHOLOGY, 843, 848, 853.(2021), available at https://doi.org/10.4236/psych.2021.126052 (last accessed June 30, 2026).

[2] Rollo, pp. 3-5.

[3] Id. at 10-32. The August 9, 2023 Decision in CA-G.R. CR-HC No. 14921 was penned by Associate Justice Ramon M. Bato, Jr. and concurred in by Associate Justices Ronaldo Roberto B. Martin and Alfonso C. Ruiz II of the Fourth Division of the Court of Appeals, Manila.

[4] Id. at 35-43. The January 21, 2020 Decision in Crim. Case No. 19-7211 was penned by Judge Raul V. Babaran of Branch x, Regional Trial Court, x.

[5] Id. at 30-31.

[6] Id. at 10-11.

[7] Id.

[8] Id. at 10.

[9] Id. at 11.

[10] Id.

[11] Id.

[12] Id.

[13] Id. at 12.

[14] Id.

[15] CA rollo, p. 60. Also referred to as "battered woman syndrome" in other parts of the rollo.

[16] Rollo, p. 14.

[17] Id. at 11.

[18] Id. at 12.

[19] Id.

[20] Id.

[21] Id.

[22] Id.

[23] Id. at 35-43.

[24] Id. at 43.

[25] Id.

[26] Id. at 12.

[27] Id. at 10-32.

[28] Id. at 31.

[29] Id. at 16.

[30] Id. at 22.

[31] Id. at 31.

[32] Id. at 3-5.

[33] Id. at 8.

[34] Id. at 51.

[35] Id.

[36] Id. at 46-47.

[37] Id. at 53-54.

[38] CA rollo, pp. 27-55.

[39] Id. at 35.

[40] Id. at 36-39.

[41] Rollo, p. 14.

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[42] CA rollo, p. 53.

[43] Id. at 72-111.

[44] Id. at 78.

[45] Rollo, p. 14.

[46] CA rollo, p. 108.

[47] People v. Tibon, 636 Phil. 521, 530 (2010) [Per J. Velasco Jr., First Division].

[48] Rollo, p. 37.

[49] Id. at 35.

[50] Id. at 37.

[51] Id. at 36.

[52] Id. at 37.

[53] Id.

[54] 464 Phil. 680 (2004) [Per J. Panganiban, En Banc].

[55] Id. at 714-715.

[56] Id. at 715.

[57] Id. at 714-715.

[58] Id. at 715-716. See also J. Sangeetha, S. Mohan, A. Hariharasudan, A., Nishad Nawaz, Strategic analysis of intimate partner violence (IPV) and cycle of violence in the autobiographical text – When I Hit You, 8 HELIYON: A CELL PRESS JOURNAL 1, 4-5 (2022), available at https://pmc.ncbi.nlm.nih.gov/articles/PMC9233205 (last accessed on June 1, 2026).

[59] J. Sangeetha, S. Mohan, A. Hariharasudan, A., Nishad Nawaz, Strategic analysis of intimate partner violence (IPV) and cycle of violence in the autobiographical text – When I Hit You, 8 HELIYON: A CELL PRESS JOURNAL 1, 5 (2022), available at https://pmc.ncbi.nlm.nih.gov/articles/PMC9233205 (last accessed on June 1, 2026).

[60] Id. See also People v. Genosa, 464 Phil. 680, 716-717 (2004) [Per J. Panganiban, En Banc].

[61] People v. Genosa, 464 Phil. 680, 748 (2004) [Per J. Panganiban, En Banc].

[62] L. Walker, et al., Beyond the Juror's Ken: Battered Women, 7 VT. L. REV. 1, 6 (1982).

[63] People v. Genosa, 464 Phil. 680, 717 (2004) [Per J. Panganiban, En Banc].

[64] Id. at 731.

[65] Id. at 735.

[66] Id. at 746-747.

[67] Republic Act No. 9262, sec. 3(c).

[68] REVISED PENAL CODE (1930), art. 11.

[69] Republic Act No. 9262 (2004), sec. 3(a)(A)(B)(C)(D), Anti-Violence Against Women and Their Children Act of 2004.

[70] United Nations, What is Domestic Abuse?, available at https://www.un.org/en/coronavirus/what-is-domestic-abuse (last accessed on June 1, 2026).

[71] Rollo, pp. 18-20.

[72] Id. at 20.

[73] Id.

[74] Id. at 12.

[75] Id.

[76] Id. at 14.

[77] Id. at 21.

[78] Id. at 22.

[79] Id. at 23-24.

[80] Vito Zepinic, Battered Women Syndrome: A Headache for Medicine and Law, 12 PSYCHOLOGY, 843, 848, 853 (2021), available at https://doi.org/10.4236/psych.2021.126052 (last accessed June 30, 2026).

[81] Id.

[82] Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), September 3, 1981, United Nations General Assembly Resolution 34/180.

[83] UN Committee on the Elimination of Discrimination against Women, Gender-Based Violence Against Women, Updating General Recommendation No. 19 (1992), 10, CEDAW General Recommendation 35, (July 26, 2017).

[84] Id. at 11.

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