

The Supreme Court and the *Genosa* Case:
Defining Battered Women Syndrome vis-à-
vis Self-Defense in the Philippine Legal
System

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This Note attempts to analyze the case of *People v. Genosa* with respect to the Court's treatment of the Battered Woman Syndrome (BWS), and determine its legal implications in criminal law, particularly with respect to the self-defense plea available to an accused. The Note first lays down the facts of the case, and identifies the issues and the respective rulings of the Court. Then the Note discusses extensively the BWS, explaining its basic concept and the cycle theory of violence. The Note also discusses the acceptance and recognition of BWS in foreign jurisprudence. It then relates the concept of BWS to self-defense in criminal law by first explaining what the latter is. There was also discussion on some mitigating circumstances which were discussed in *Genosa*, namely passion and obfuscation and diminished will power. The Note posits that the Court, in requiring proof of both the state of mind of the batterer-victim and accused-battered woman, may have set very stringent requirements for proving BWS.