

Title: People of the Philippines v. XXX

Facts: XXX, the accused-appellant, was charged with the crime of Qualified Trafficking in Persons under Section 4(e), in relation to Section 6(a), of Republic Act (R.A.) No. 9208, as expanded by R.A. No. 10364. Accused-appellant pleaded not guilty; however, trial showed that Stanford of the Australian Federal Police referred to the Philippine National Police-Women and Children Protection Center (PNP-WCPC) an online child exploitation case which led to an investigation involving accused-appellant and a minor named AAA. Accused-appellant was found to have offered and peddled AAA, his ten-year-old niece, to a foreign undercover operative posing as a customer for sexual services in exchange for money. Upon arranging an entrapment operation at SM Megamall, the operatives successfully apprehended XXX as he accepted marked money representing payment for AAA's sexual procurement.

Throughout the trial, the prosecution presented multiple witnesses and evidence demonstrating the accused's engagement in child trafficking activities. On July 25, 2018, the Regional Trial Court (RTC) rendered a guilty verdict, sentencing XXX to life imprisonment and fines amounting to P2,000,000.00, moral damages of P500,000.00, and exemplary damages of P100,000.00. The Court of Appeals (CA) affirmed this decision on October 15, 2019. Accused-appellant's contention questioning AAA's age and questioning his identification as the person behind the email account ivyian1823@protonmail.com was dismissed both by the RTC and the CA.

Issues:

1. Whether the age of the victim, as a qualifying circumstance, was sufficiently established.
2. Whether the prosecution successfully established the identity of accused-appellant as the person corresponding through the email account ivyian1823@protonmail.com.

Court's Decision: The Supreme Court affirmed the CA's decision, finding no merit in the accused-appellant's arguments. The evidence presented by the prosecution, including testimonies of witnesses and documentary evidence, established the minor's age and the accused-appellant's identity beyond reasonable doubt.

Doctrine: For a successful prosecution of Trafficking in Persons, the following elements must be established: (i) the act of recruitment, transportation, transfer, harboring, or receipt of persons within or across national borders; (ii) the use of threat, force, or other means of coercion; and (iii) the purpose is exploitation, including sexual exploitation, forced

labor, or removal of organs. The crime is qualified when the trafficked person is a “child.”

Class Notes:

- Trafficking in Persons: Elements include act, means, and purpose.
- Qualified Trafficking in Persons: When the victim is a child below eighteen (18) years of age or unable due to a disability to protect themselves from exploitation.
- Life imprisonment and fines as prescribed penalties for Qualified Trafficking in Persons under R.A. No. 9208, as expanded by R.A. No. 10364.
- Prostitution and Sexual Exploitation: Defined under R.A. No. 9208 as sexual acts for remuneration or any other consideration, with the exploitation factor typically involving abuse of vulnerability or coercion.
- Credibility of child victims’ testimony: Courts give deference to testimonies of young victims due to their vulnerability and the shame involved in exposing such abuse.

Historical Background: The case signifies the judiciary’s commitment to upholding strict legal measures against traffickers and to ensuring the protection of children’s welfare and rights, which is a fundamental state policy enshrined in both the Philippine Constitution and the international human rights standards. The legislative measures R.A. No. 9208 and its amending law, R.A. No. 10364, illustrate the Philippine government’s response to the global problem of human trafficking, particularly child trafficking and sexual exploitation, and affirm the country’s adherence to the protection of human rights.