

Title:

People of the Philippines vs. Isabel Rios y Catagbui: A Case of Large Scale Illegal Recruitment and Estafa

Facts:

****Step-by-Step Events and Procedural Posture:****

1. Isabel Rios, along with Anna Espiritu and Ellen Mabborang (at-large), was charged under RA 8042 (Migrant Workers and Overseas Filipinos Act of 1995) and with eight counts of estafa as per Article 315(2)(a) of the Revised Penal Code (RPC), for fraudulent recruitment activities between July 2007 to December 2008, targeting employment in Taiwan and Singapore, and received payments from eight complainants without actual job deployment.
2. Rios pleaded “not guilty” upon arraignment. Pre-trial motions and a Confession of Judgment regarding civil aspect reimbursement for some complainants were filed.
3. After the dismissal of a Demurrer to Evidence, trial proceeded; the prosecution and defense presented their versions, highlighting Rios’s role and transactions conducted by Mabborang and Espiritu.
4. The RTC convicted Rios, sentencing her to life imprisonment for large-scale illegal recruitment and varying imprisonment for estafa counts, ordering fee reimbursements.
5. The CA affirmed RTC but modified, dropping charges under Section 6(l) of RA 8042 for absence of DOLE evidence on non-deployment reasons, upheld others, and adjusted estafa sentences.
6. Rios appealed, asserting her non-direct involvement and challenging the validity of the Confession of Judgment. OSG maintained the conviction.

Issues:

1. Whether Rios’s guilt for large-scale illegal recruitment and estafa was proven beyond reasonable doubt.

Court’s Decision:

The Supreme Court affirmed with modification:

- Upheld the conviction for large-scale illegal recruitment under Section 6(m) of RA 8042 against five complainants, sentencing Rios to life imprisonment and fine.
- Acquitted Rios of estafa charges due to lack of false pretenses or fraudulent representations as the main element.

Doctrine:

- Large Scale Illegal Recruitment can be committed even by licensed agencies, upon failure

to reimburse incurred expenses without the worker's fault (RA 8042, Section 6[m]).

- Officers of juridical entities may be held personally liable for corporate actions manifesting assent to unlawful acts or indicative of gross negligence/bad faith.

Class Notes:

- ****Illegal Recruitment (Large Scale)****: Committed against three or more persons, constituting economic sabotage. Requires promise or impression of employment capacity, receipt of payment, non-deployment without worker fault, and failure to reimburse expenses.

- ****Estafa (Article 315[2][a], RPC)****: Necessitates proving false pretense or fraudulent acts prior to or simultaneously with fraud commission, leading to defrauded parties suffering damage.

Historical Background:

This case underscores the judicial stance against exploitative recruitment practices, enforcing strict compliance with labor and employment laws to protect workers aiming for overseas employment. It highlights the seriousness afforded to fraudulent recruitment activities, underscoring the comprehensive legislative framework aimed at safeguarding Filipino migrant workers.