

### Title: People of the Philippines vs. Nancy Lasaca Ramirez a.k.a. “ZOY” or “SOY”

### Facts:

The case involves Nancy Lasaca Ramirez, convicted of qualified trafficking in persons under Section 4(e) of Republic Act No. 9208 (Anti-Trafficking in Persons Act of 2003). On December 5, 2009, an entrapment operation was conducted by the Regional Anti-Human Trafficking Task Force in Lapu-Lapu City, resulting in Ramirez’s arrest for pimping out four women, two of whom were minors, for sexual exploitation.

The prosecution presented evidence including the testimonies of Police Officer 1 Nef Nemenzo and the minor victims, proving Ramirez’s involvement in the recruitment and pimping of these individuals. Ramirez defended herself by claiming wrongful arrest and denying involvement, stating she was merely at the location to watch a live band.

Her conviction by the Regional Trial Court was affirmed by the Court of Appeals. Ramirez appealed to the Supreme Court, arguing her innocence and highlighting discrepancies in the prosecution’s case. The Supreme Court examined the elements of trafficking in persons and, based on the evidence, upheld Ramirez’s conviction, emphasizing the exploitation of the victims’ vulnerabilities and dismissing Ramirez’s defense of denial.

### Issues:

1. Whether Nancy Lasaca Ramirez was guilty beyond reasonable doubt of qualified trafficking in persons.
2. The relevance of the victims’ consent in trafficking cases involving minors.
3. The applicability of denial as a defense against positive identification by witnesses.

### Court’s Decision:

The Supreme Court dismissed the appeal, affirming Ramirez’s conviction for qualified trafficking in persons. It highlighted that the elements of the crime were satisfied, notably the exploitation of minors for sexual purposes. The Court emphasized that the victims’ consent is irrelevant in cases involving minors, pursuant to the anti-trafficking law. Ramirez’s defense of denial was also found weak against the positive identification by witnesses.

### Doctrine:

The Supreme Court reiterated the principles under the Anti-Trafficking in Persons Act of 2003, particularly the irrelevance of a minor victim’s consent in trafficking cases and the sufficiency of positive identification to overcome a defense of denial.

### Class Notes:

1. In trafficking cases, the victims' consent is not a defense, especially when minors are involved.
2. Positive identification by witnesses can significantly undermine a defense of denial.
3. Qualified trafficking in persons involves not just recruitment but also the act of maintaining or hiring a person to engage in prostitution, with children as victims being a qualifying circumstance leading to higher penalties.

Relevant Legal Statutes:

- Republic Act No. 9208 (Anti-Trafficking in Persons Act of 2003), Section 4(e): Outlaws maintaining or hiring a person to engage in prostitution or pornography.
- Elements of Trafficking: Recruitment, means of coercion, and purpose of exploitation.

### Historical Background:

The case underscores the Philippines' efforts to combat human trafficking, especially involving minors, under Republic Act No. 9208. It reflects the judiciary's commitment to protecting children and other vulnerable populations from exploitation and upholding the law's stringent provisions against trafficking in persons.