

Title:

People of the Philippines vs. Susan Sayo y Reyes and Alfredo Roxas y Sagon

Facts:

On November 16, 2005, Susan Sayo and Alfredo Roxas were indicted for violating Republic Act No. 9208 or the Anti-Trafficking in Persons Act of 2003. They were accused of recruiting and transporting minors for prostitution and sexual exploitation, and Roxas was additionally charged with managing and operating a room used for such purposes. Despite pleading not guilty, the Regional Trial Court (RTC) convicted them, a decision later affirmed by the Court of Appeals (CA) with modifications including awards for moral and exemplary damages.

The case reached the Supreme Court upon the filing of a Notice of Appeal by the accused-appellants. The prosecution presented evidence showing the “plaza girls” were controlled by Sayo, detailing the entrapment operation “Oplan Sagip Angel” that led to their arrests. Conversely, Sayo claimed wrongful arrest while soliciting passengers, and Roxas narrated an unexpected encounter with the arresting team, asserting innocence.

Issues:

1. Whether the Information charged the accused with more than one offense, making it duplicitous.
2. Whether the trial court appropriately waived objections to the supposed duplicity of the Information.
3. Whether the guilt of the accused was proven beyond reasonable doubt.
4. The correct application and interpretation of R.A. 9208 provisions concerning the crimes the accused were found guilty of.

Court’s Decision:

The Supreme Court focused solely on Alfredo Roxas’s liability due to Susan Sayo’s death, which extinguished her criminal and civil liabilities. The Court affirmed that Roxas knowingly allowed his property to be used for prostitution, signifying an act that promoted trafficking under Section 5(a) of R.A. 9208. However, it identified errors in the lower courts’ decisions regarding the conviction under “Qualified Trafficking” noting that Roxas should have been found guilty only of “Acts that Promote Trafficking in Persons,” resulting in a modified sentence and fine. Additionally, the Court ordered Roxas to pay moral and exemplary damages to the victims.

Doctrine:

The Supreme Court clarified the distinction between “Acts of Trafficking in Persons” under Section 4 of R.A. 9208 and “Acts that Promote Trafficking in Persons” under Section 5, emphasizing that the latter cannot be qualified by circumstances enumerated in Section 6 of the same Act, a misunderstanding which significantly impacted Roxas’s conviction and penalties.

Class Notes:

- ****Duplicity of Information:**** A single Information should charge only one offense unless a single punishment for various offenses is prescribed by law.
- ****Credibility of Witness Testimony:**** The testimony of witnesses, especially victims and arresting officers, when straightforward, direct, and corroborate each other’s accounts, significantly outweighs defenses of denial and alibi.
- ****Death of the Accused:**** An accused’s death pending appeal extinguishes both their criminal and civil liabilities tied directly to the offense committed.
- ****Interpretation of Trafficking Laws:**** Distinctions between trafficking and acts promoting trafficking under R.A. 9208 are crucial for determining the correct charges, penalties, and whether certain circumstances qualify the crime.

Historical Background:

This case reflects the practical challenges and legal nuances encountered in prosecuting crimes under the Anti-Trafficking in Persons Act of 2003 in the Philippines. It demonstrates the judicial system’s evolving understanding and application of anti-trafficking laws, emphasizing the necessity for correct legal interpretation to ensure justice for victims while upholding the rights of the accused.