

****Title:** People of the Philippines vs. Joko Celis y Pine a.k.a. “Jaztine” or “Joco/Joko”**

****Facts:**** This case involves the defendant, Joko Celis y Pine, alias “Jaztine” or “Joco/Joko,” who was convicted of seven counts of Qualified Trafficking in Persons under Section 4(a) in relation to Section 6 (a) and (c) of the Anti-Trafficking in Persons Act of 2003 (Republic Act No. 9208), as amended by the Expanded Anti-Trafficking in Persons Act of 2012 (Republic Act No. 10364). The charges stemmed from events on January 30, 2018, at Turtle Family KTV, where Celis allegedly recruited, offered, and transported minors and young adults for sexual exploitation.

Celis was apprehended following an entrapment operation triggered by reports to the Philippine National Police Women and Children Protection Center-Anti-Trafficking in Persons Division (PNP WCPC-ATIPD) about his activities. The operation involved undercover officers who confirmed Celis’ offer to provide underage girls for sexual services in exchange for payment. Following his arrest, Celis, maintaining his innocence, faced trial where the prosecution presented the testimonies of the victims and the arresting officers.

The Regional Trial Court (RTC) found Celis guilty, a decision affirmed by the Court of Appeals. Celis appealed to the Supreme Court, challenging the sufficiency of evidence regarding his deceit and exploitation of the victims’ vulnerabilities.

****Issues:**** The primary legal issue was whether the Court of Appeals correctly upheld Celis’ conviction for Qualified Trafficking in Persons, focusing on the recruitment, offering, and transportation of minors and young adults for sexual exploitation, and whether deceit and exploitation of vulnerability were sufficiently proven.

****Court’s Decision:**** The Supreme Court denied Celis’ appeal, affirming his conviction with modifications regarding sentencing in some counts due to insufficient evidence of the victims’ minority status. The Court detailed the recruitment process, the deceit and exploitation of the victims’ vulnerabilities, and the intended purpose of sexual exploitation. The Court highlighted that the transaction itself, irrespective of the actual occurrence of sexual acts, sufficed to consummate the crime. It upheld the life imprisonment and fines imposed by the lower courts for the qualified charges, adjusting penalties for the non-qualified charges due to insufficient proof of minority.

****Doctrine:**** The Supreme Court reiterated that for trafficking in persons to be consummated, actual sexual intercourse or lascivious acts need not occur. The recruitment and intention for exploitation establish the crime. Further, the Court clarified guidelines for

proving age in trafficking cases, emphasizing the protection of minors as a paramount concern.

****Class Notes:****

1. ****Qualified Trafficking in Persons**** - Recruitment, transportation, or harboring of persons, using means like deceit or exploitation of vulnerability, for sexual exploitation.
2. ****Elements for Prosecution:****
 - Act of trafficking (recruitment, transportation, harboring)
 - Means used (deceit, use of force, exploitation of vulnerability)
 - Purpose of trafficking (sexual exploitation, forced labor)
3. ****Proof of Age:**** Original or certified true copy of the birth certificate is the best evidence. In its absence, baptismal certificates, school records, or testimony concerning the victim's age from relatives may suffice.
4. ****Vulnerability:**** Exploitation of the victims' vulnerabilities (age, poverty, family situation) is a critical factor in trafficking crimes.
5. ****Entitlement to Damages:**** Victims are entitled to moral and exemplary damages, highlighting the significant impact of trafficking on victims' well-being.

****Historical Background:**** The legal framework for combating human trafficking in the Philippines has evolved to strengthen protections, particularly for minors and other vulnerable individuals. This case exemplifies the judicial system's application of these laws, underscoring the importance of safeguarding human rights and dignity against exploitation and abuse.