

Title: Young vs. People of the Philippines

Facts

Members of the Regional Anti-Human Trafficking Task Force (RAHTTF) of the Philippine National Police (PNP) conducted surveillance at Jaguar KTV Bar in Cebu City and found transactions involving guest relations officers (GROs) were occurring for sexual services. The RAHTTF identified petitioners Vinson D. Young a.k.a. Benzon Ong and Benny Young a.k.a. Benny Ong as the owners of Jaguar.

During an entrapment operation on April 9, 2011, undercover police officers handed marked money (P15,000.00) to the establishment's manager in exchange for sexual services. Following the signal, the RAHTTF raided Jaguar, arresting several individuals, recovering the marked money, and rescuing 146 women and minors. Six women (AAA, BBB, CCC, DDD, EEE, and FFF) later identified Vinson and Benny as the owners of Jaguar.

A criminal complaint was filed for violations of the Anti-Trafficking in Persons Act of 2003 (RA 9208). Vinson denied ownership, citing he had transferred his interests to Charles Theodore Rivera per a Deed of Assignment dated December 14, 2009. Benny claimed mistaken identity.

During the preliminary investigation, the six women recanted their statements. Nevertheless, the Office of the City Prosecutor (OCP) found probable cause and ordered the indictment of Vinson, Benny, Tico (manager), and Ann (greeter) but did not initially consider sufficient evidence for the minority of two victims as a qualifying circumstance. Both prosecution and defense motions for reconsideration led the OCP to modify its resolution, subsequently considering the minority as an additional qualifying circumstance.

Issues

1. **Whether the CA erred in finding grave abuse of discretion by the RTC in dismissing the criminal case for lack of probable cause.**
2. **Whether a motion for reconsideration is a prerequisite to filing a certiorari petition.**

Court's Decision

Resolution of Issues:

1. **Grave Abuse of Discretion by the RTC:**
 - The Supreme Court held that the RTC overstepped its jurisdiction by delving into evidentiary matters beyond its mandate to determine the existence of probable cause solely for the purpose of issuing arrest warrants. Contrary to the RTC's findings, the evidence

provided by the prosecution sufficiently established probable cause implicating petitioners in human trafficking. Thus, the case should not have been dismissed but proceeded to trial to address these issues.

- **Decision**: The CA correctly identified grave abuse of discretion by the RTC as it failed to consider all pertinent evidence properly.

2. **Certiorari Petition Requirements**:

- The Court acknowledged that a motion for reconsideration is generally required before filing a certiorari petition. However, certain exceptions exist, such as when the order is a patent nullity, like when issued with grave abuse of discretion or when involving urgent public interest. Given the nature of human trafficking as a severe, publicly significant crime, the direct recourse to a certiorari petition by the OSG was deemed appropriate in this case.

- **Decision**: The CA was correct in entertaining the certiorari petition without the need for a prior motion for reconsideration.

Doctrine

- **Probable Cause Determination**: The executive (public prosecutor) and judicial (judge) branches serve distinct roles. The judge can dismiss a case only when the evidence unmistakably negates probable cause.

- **Certiorari Petition Exceptions**: Direct filing of certiorari is allowable when grave abuse of discretion is evident, or when significant public interest is implicated without the necessity of a motion for reconsideration.

Class Notes

- **Elements of Trafficking (RA 9208)**:

- Recruitment, transportation, transfer, harboring, provision, or reception of persons by means of threat, force, intimidation, abduction, fraud, deception, abuse of power.

- Purpose includes exploitation, encompassing forced labor, involuntary servitude, prostitution, among others.

- **Probable Cause Determination**:

- Executive: Evaluate sufficiency of facts for filing information (prosecutor's function).

- Judicial: Preliminary consideration for arrest warrant issuance (judge's function).

- Clear-cut Cases: In clear-cut cases where evidence does not support probable cause, dismissal by the judge is warranted.

- **Certiorari Petition**:

- Requirements for motion of reconsideration exception: Public interest, nullity orders, urgent resolution necessity.

Historical Background

This case is set against the backdrop of the Philippines' efforts to combat human trafficking, which remains a pressing issue. RA 9208, or the Anti-Trafficking in Persons Act of 2003, was legislated as part of these efforts to protect individuals, especially women and children, from exploitation, illegal recruitment, and forced labor. The case highlights procedural and substantive challenges in the enforcement of anti-trafficking laws, reflecting judicial and prosecutorial roles in supporting the law's intent to eradicate human trafficking.