

****Title: Marwin B. Raya and Shiela C. Borrromeo vs. People of the Philippines****

****Facts:****

On March 26, 2014, Marwin B. Raya (Raya) and Shiela C. Borrromeo (Borrromeo) were implicated in a case of qualified trafficking in persons, as defined and penalized under Section 4(e), in relation to Sections 3(a), 3(c), and 6(c) of Republic Act No. 9208, as amended by R.A. No. 10364. The Regional Trial Court (RTC) of Marikina City, Branch 263, presided over Criminal Case No. 2014-15716-MK, wherein Raya and Borrromeo were accused of recruiting, obtaining, hiring, providing, offering, and transporting three complainants (initials AAA, BBB, and CCC) for purposes of engaging them in sexual activities in exchange for money.

During a surveillance and subsequent entrapment operation conducted on March 26, 2014, law enforcement officials testified that they witnessed Raya and Borrromeo offering the services of young women to customers. The surveillance operation, ordered after coordination with the International Justice Mission (IJM) and the Department of Social Work and Development (DSWD), led to the arrest of Raya and Borrromeo amidst suspicions of human trafficking activities. Members of the apprehending team, including police officers and DSWD personnel, provided extensive testimonies detailing the events of the operation.

After the prosecution presented its evidence, Raya and Borrromeo filed a Motion for Leave to File Attached Demurrer to Evidence, which the RTC granted, citing inconsistencies in the prosecution's witnesses. Displeased with the RTC's ruling, the Office of the Solicitor General (OSG) appealed to the Court of Appeals (CA).

The CA, in a Decision dated October 19, 2017, reversed the acquittal and ordered the reinstatement of the case for continuation. Raya and Borrromeo filed a petition for review on certiorari to the Supreme Court, assailing the CA's reversal of their acquittal.

****Issues:****

1. Whether the CA erred in reversing the acquittal of Raya and Borrromeo.
2. Whether the RTC was correct in granting the Demurrer to Evidence filed by Raya and Borrromeo.

****Court's Decision:****

1. ****Reversal of Acquittal by the CA:****

- The Supreme Court held that the CA erred in granting the People's petition for certiorari and reversing the acquittal.
- The right against double jeopardy, enshrined in Article III, Section 21 of the 1987 Constitution, prohibits a person from being prosecuted again after an acquittal.
- The Court emphasized that certiorari can only be issued to correct errors of jurisdiction, not to correct perceived errors of judgment or to review evidence. The CA's action violated the constitutional guarantee against double jeopardy.

2. ****Grant of Demurrer to Evidence by the RTC:****

- The Supreme Court recognized that the RTC erroneously granted the Demurrer based on inconsistencies regarding operational details, which were deemed immaterial to the crime charged.
- The higher court accepted that the RTC focused improperly on irrelevant discrepancies, such as the coordination with a different police station and the use of confidential informants, instead of the totality of evidence relevant to the offense's elements.
- Nevertheless, regardless of the RTC's errors in judgment, the acquittal could not be revisited by means of certiorari without violating the constitutional protection against double jeopardy.

****Doctrine:****

- **Doctrine of Finality-of-Acquittal:** A judgment of acquittal, erroneous or not, is final, unappealable, and immediately executory upon promulgation. An acquittal can only be revisited in situations of a sham trial or when the prosecution was denied due process.
- **Right Against Double Jeopardy:** Codified in Article III, Section 21 of the 1987 Constitution, preventing a person from being tried again for the same offense following an acquittal, is a bedrock principle protecting individuals from continuous prosecution and potential wrongful convictions.

****Class Notes:****

- ****Key Statutory Provisions:****

- R.A. No. 9208 (Anti-Trafficking in Persons Act of 2003)
- R.A. No. 10364 (Expanded Anti-Trafficking in Persons Act of 2012)

- ****Key Legal Principles:****

- Valid Indictment, Competent Jurisdiction, Arraignment, Valid Plea, Acquittal/Conviction for the right against double jeopardy to attach.

- The finality-of-acquittal doctrine, which prevents the appeal of acquittals barring gross violations of due process.

- ****Application:****

- Highlight the critical relevance of prosecution witness credibility and consistency in evidence.

- Emphasize the importance and strategic planning in implementing successful surveillance and entrapment operations without procedural missteps.

****Historical Background:****

This case represents the ongoing struggle against human trafficking in the Philippines, a socio-legal issue the government has sought to combat through comprehensive legislation such as R.A. No. 9208 and R.A. No. 10364. The involvement of agencies like IJM and DSWD highlights the collaborative enforcement efforts within legal and social service frameworks to protect vulnerable populations from exploitation. The case underscores the judiciary's role in upholding procedural constitutional safeguards while addressing these complex issues.