

Title: People of the Philippines vs. Ranie Estonilo y De Guzman (G.R. No. 235652, December 26, 2022)

Facts:

- **January 2010:** Ranie Estonilo approaches AAA (12 years old) to “mamakla” (engage in sexual activity with a gay person) in exchange for money.
- **March 6, 2010:** Estonilo calls AAA and BBB (11 years old) as they were on their way home, encouraging them to perform sexual acts on each other for PHP 300, which they eventually do.
- **March 13, 2010:** Estonilo convinces AAA and BBB to engage in sexual acts again near a bathroom at a swimming pool. Estonilo suggests that AAA have sex with BBB’s 11-year-old aunt, but AAA refuses.
- **Next Day:** AAA experiences pain while urinating, gets medical consultation, and reveals the abuses to his mother, leading to the filing of complaints.

Procedural Posture:

1. **Informations Filed:** Two Informations for Qualified Trafficking in Persons were filed against Estonilo in the Regional Trial Court (RTC).
2. **RTC’s Judgment:** On July 28, 2016, the RTC found Estonilo guilty of two counts of Qualified Trafficking in Persons, sentencing him to life imprisonment and PHP 2,000,000 fine per count and awarding moral damages to AAA and BBB.
3. **CA’s Decision:** On appeal, the Court of Appeals (CA), on November 23, 2017, modified the RTC ruling, finding Estonilo guilty of violations under Section 5(a)(5) of RA 7610 and reduced the penalty to 14 years and 8 months to 20 years of reclusion temporal with increased moral damages.
4. **Supreme Court Appeal:** Estonilo appealed to the Supreme Court (SC), challenging the CA’s decision.

Issues:

1. **Substantive:** Whether Estonilo should be held criminally liable for Qualified Trafficking in Persons under RA 9208 or for violations under RA 7610.
2. **Procedural:** Whether the proper mode of appeal was followed and if the SC is compelled to review the CA’s decision on its merits.

Court’s Decision:

1. **Procedural Issue:** Though Estonilo filed the appeal incorrectly using a Notice of Appeal rather than a petition for certiorari under Rule 45, the Supreme Court opted to

review the case on its merits in the interest of substantial justice.

2. **Substantive Issue:**

- **Qualified Trafficking in Persons:**

- **Acts:** Estonilo's actions included befriending minors and luring them into sexual activities in exchange for money.

- **Means:** Estonilo used coercion and took advantage of the vulnerability of AAA and BBB.

- **Purpose:** The sexual exploitation of minors was established as Estonilo sought monetary benefits by making the children engage in sexual acts.

- The Supreme Court found that all the elements required for Qualified Trafficking in Persons under Section 4(a) in relation to Section 6(a) of RA 9208 were satisfied. The CA's finding was incorrect in not recognizing the recruitment and exploitation of minors even if the sexual acts performed involved only AAA and BBB and not Estonilo's clients.

3. **Penalty:** The proper penalty under RA 9208 was life imprisonment and a fine of P2,000,000 per count. Additionally, moral and exemplary damages were imposed on AAA and BBB, with interest from the finality of the decision until paid.

Doctrine:

- **Trafficking in Persons:** The act of recruiting or using a person, specifically a child, for sexual exploitation, regardless of the physical presence of the exploiter's clients or the actual engagement in sexual acts with them, constitutes trafficking.

- **Qualified Trafficking:** When the trafficked person is a child, the crime of trafficking is automatically qualified, warranting higher penalties.

Class Notes:

- **Elements of Qualified Trafficking in Persons:**

1. **Act:** Recruitment, transportation, transfer, harboring, or receipt of persons.

2. **Means:** Threat, use of force, coercion, fraud, deception, abuse of power/position, exploitation of vulnerability, or payments/benefits.

3. **Purpose:** Exploitation including sexual exploitation, forced labor, or slavery.

4. **Qualified Condition:** If the trafficked person is a child.

- **Key Statutory Provisions:** Sections 3(a), 4(a), and 6(a) of RA 9208 ("Anti-Trafficking in Persons Act of 2003").

Historical Background:

- ****Context:**** The “Anti-Trafficking in Persons Act of 2003” (RA 9208) was enacted to address and eliminate trafficking, particularly of women and children, by establishing comprehensive measures for their protection and support. This case reflects the application of legal provisions designed to protect minors from sexual exploitation and trafficking.