

Title: People of the Philippines v. Aguirre, et al., Qualified Trafficking Conviction

Facts:

Jehlon Aguirre, Michael Arabit, Jefferson Paralejas, and Jeffrey Roxas were accused of recruiting, transporting, harboring, and providing ten women, including seven minors, for the purposes of prostitution and sexual exploitation. Four of the victims, who testified in court (AAA, BBB, CCC, and DDD), recounted that they were lured with promises of money, drugs (shabu), and foreign travel. The prosecution alleges that on November 16, 2010, the accused convinced the victims to a location where they were supposed to meet foreigners for prostitution.

The case was initiated in the Regional Trial Court (RTC) of Quezon City, Branch 106, and was docketed as Criminal Case No. Q-10-167652. The RTC convicted Aguirre, Arabit, and Paralejas while acquitting Roxas for lack of evidence linking him directly to the crime. The accused then appealed the decision to the Court of Appeals (CA), which affirmed the RTC's decision but modified the liabilities in terms of damages.

Issues:

1. **Whether the guilt of the accused was proven beyond reasonable doubt for the crime of Qualified Trafficking in Persons under RA 9208.**
2. **Whether the testimonies of the private complainants should be considered hearsay.**
3. **Whether the absence of foreigners in the apartment invalidates the trafficking charge.**
4. **Whether the conviction should consider the mandates under RA 9208 due to the age and conditions of the victims.**
5. **Whether the penalty, including moral and exemplary damages, was correctly imposed by the RTC and affirmed by the CA.**

Court's Decision:

1. **Guilt Proven Beyond Reasonable Doubt:**
 - The Court affirmed that the elements of trafficking in persons were satisfied:
 - Act of recruitment and transportation.
 - Means used include deception and taking advantage of the victims' vulnerability.
 - Purpose of exploitation for prostitution.
 - The prosecution presented consistent, credible testimonies of the victims, corroborated by police officers who staged the intervention.

2. **Testimonies as Non-Hearsay:**

- The Court held that statements made to and directly heard by the victims were not hearsay. Their direct testimonies were valid evidence of what was personally experienced and perceived, particularly statements made by the accused regarding their intentions.

3. **Absence of Foreigners:**

- The absence of foreigners at the apartment did not exonerate the accused. The crime of trafficking was established by their actions of luring, recruiting, and preparing the victims for eventual sexual exploitation, regardless of whether the exploitation was consummated.

4. **RA 9208 Mandates:**

- The Court noted that trafficking of minors does not require that the recruitment involve force or coercion. The evidence showed victims were minors, meaning recruitment and transportation without coercion suffices under the law.

- The testimonies established a conspiracy among the accused to traffic the victims with a common purpose of sexual exploitation.

5. **Penalties:**

- Reiterating the qualified nature of the crime due to the victims' minority, the Court upheld life imprisonment and a fine for each convicted individual.

- Modified damages: increased moral damages to P500,000 and exemplary damages to P100,000, adhering to principles under the Civil Code and precedent cases.

Doctrine:

- **Expanded Anti-Trafficking in Persons Act of 2012 (RA 10364) Amendments:** The recruited and transportation of minors, without requiring coercion, establish the offense.

- **Article 39 of the Revised Penal Code:** Proscribes subsidiary imprisonment when the principal penalty is higher than prison correccional.

- **Article 2219 of the Civil Code:** Provides a basis for awarding moral damages for criminal offenses such as trafficking.

Class Notes:

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

1. Recruitment/transportation/transfer with or without victim's consent.

2. Means (coercion, deception, vulnerability, etc.).

3. Purpose: exploitation (prostitution, sexual exploitation, etc.).

- **Hearsay Rule:** Direct testimony of events witnessed personally by victims is

admissible.

- **Definition of a “Child” under RA 9208:** Person below 18 years of age or those with vulnerabilities preventing self-protection from abuse.

Historical Background:

- **Anti-Trafficking in Persons Act of 2003 (RA 9208):** Enacted to combat human trafficking and exploitation.

- **RA 10364 (2012 Expansion):** Strengthened the provisions and added more protective measures for victims, especially minors, reflecting increased national and international awareness and cooperation against human trafficking.