

**\*\*Title:\*\*** People of the Philippines v. Carol M. dela Piedra

**\*\*Facts:\*\***

On January 30, 1994, Erlie Ramos, a Philippine Overseas Employment Agency (POEA) attorney, received a call about illegal recruitment by Carol Figueroa. Ramos, together with Mayeth Bellotindos, conducted surveillance at Tetuan Highway, Zamboanga City. Bellotindos, posing as an applicant, entered a house and interacted with several people, including Carol Figueroa, who discussed employment abroad.

On February 1, 1994, Ramos coordinated with Capt. Mendoza of the Criminal Investigation Service (CIS) to apprehend the alleged recruiter. On the following day, SPO2 Erwin Manalopilar and Eileen Fermindoza conducted surveillance and planned an entrapment. Fermindoza posed as an applicant, and upon receiving a form from Carol, signaled the raiding team.

During the raid, the team seized various application forms and apprehended Carol Figueroa, who was later discovered to have aliases including Carol Llena and Carol dela Piedra. It was confirmed by the POEA that Figueroa was not authorized to engage in recruitment activities. The raiding team also collected affidavits from supposed recruits, including Lourdes Modesto and Nancy Araneta, who testified receiving recruitment offers from Carol.

Carol dela Piedra denied the allegations, stating she visited Jasmine Alejandro only to pass a message and collect items for a friend in Singapore. She claimed no involvement in recruitment. Two defense witnesses, Jasmine Alejandro and Ernesto Morales, corroborated Carol's story, denying any recruitment activities.

The RTC convicted Carol dela Piedra of large-scale illegal recruitment and sentenced her to life imprisonment with a P100,000 fine. Carol appealed, raising constitutional challenges and procedural errors.

**\*\*Issues:\*\***

1. **\*\*Constitutionality of Article 13(b) of the Labor Code:\*\***
  - Is the definition of "recruitment and placement" under the Labor Code void for vagueness?
  - Does it violate due process and equal protection clauses by criminalizing ordinary referral conduct and discriminating against the appellant?
2. **\*\*Legality of the arrest and seizure:\*\***

- Was the entry into Jasmine Alejandro's house without a search warrant a violation of constitutional rights?
- Was the arrest of Carol dela Piedra illegal, rendering any seized evidence inadmissible?

3. **Denial of recruitment conduct:**

- Did the evidence sufficiently demonstrate that Carol engaged in recruitment activities against three or more individuals constituting large-scale illegal recruitment?

**Court's Decision:**

1. **Constitutionality Issue:**

- The Supreme Court stated that Article 13(b) is not void for vagueness as it provides a clear legal standard. It defines specific conduct constituting "recruitment and placement" and does not fail to give fair notice or encourage arbitrary enforcement. The doctrine of overbreadth was also not applicable as the provision does not inhibit constitutionally protected conduct.

2. **Equal Protection:**

- The claim of unequal application of the law was dismissed. Appellant failed to provide evidence of intentional discrimination. The prosecutorial discretion exercised in charging Carol dela Piedra was presumed regular absent clear proof of biased application.

3. **Legality of Arrest and Seizure:**

- The court found the arrest based on probable cause. Despite questions surrounding the warrantless entry, the testimonies of Lourdes Modesto and Nancy Araneta proved sufficient for conviction, independent of the seized documents' legality.

4. **Recruitment Conduct and Scale:**

- While recruitment activities against Araneta and Modesto were proven beyond reasonable doubt, evidence of recruitment against a third individual (Baez) was insufficient. Therefore, Carol was guilty of simple illegal recruitment but not large-scale recruitment.

**Doctrine:**

- The Supreme Court reaffirmed that vague laws fail due process when they do not offer clear conduct definitions or encourage arbitrary enforcement, as stated in similar rulings (e.g., *People vs. Nazario*).
- The statute's presumption clause in Article 13(b) establishes a disputable presumption of

recruitment when dealing with two or more people, which supports unlawful labor recruitment policies' enforcement.

- Equal protection claims require clear evidence of discriminatory intent, not mere prosecutorial discretion.

**\*\*Class Notes:\*\***

1. **\*\*Elements of Illegal Recruitment:\*\***

- No valid license.
- Engaging in recruitment activities as defined.

2. **\*\*Large-Scale Illegal Recruitment:\*\***

- Proven illegal recruitment against three or more persons.

3. **\*\*Relevant Statutes:\*\***

- Article 13(b) Labor Code: Defines recruitment and placement.
- Article 38 Labor Code: Outlines illegal recruitment activities.

**\*\*Historical Background:\*\***

- The Filipinos' aspiration for overseas employment due to economic challenges has led to stringent regulations against illegal recruitment, seen as preying on vulnerable job seekers. This social-economic context gives rise to numerous legislative measures to protect Filipino workers from exploitation by illegal recruiters. The ruling is set against these ongoing efforts to curb economic sabotage by large-scale illegal recruitment, which threatens both individuals' welfare and economic stability.