

PANEL

COERCIVE CONTROL - THE MOST IMPORTANT SUBJECT IN FAMILY LAW?

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VS

HEALTHY CONFLICT

Isolated, time-limited disagreement
Both voices heard & respected
Power shared — MUTUALITY
Seeks repair & resolution
Preserves each person's freedom

Coercive control - is there any more important subject in family finance law?



- More women in England die by suicide as a result of domestic abuse than are killed by perpetrators.
- On average, it takes 18 attempts for a victim of domestic abuse to leave their abuser. These are not simple cases.
- Purpose of this session

Jurisdictional Snapshot: Where Does the Law Stand? Australia



- Family Law Amendment (No. 2) Act 2024: economic and financial abuse
- The emerging question: how much more money should a victim receive because of the economic consequences of abuse?
- Hot off the press, a worked example from caselaw. 8 July 2026
Ziskind & Greco (No 2) [2026]

England and Wales: The Tide is Turning



- Coercive control criminalised since s. 76 Serious Crime Act 2015. Economic abuse recognised in the Domestic Abuse Act 2021.
- Matrimonial Causes Act 1973 s. 25(2)(g): conduct is relevant only if it would be inequitable to disregard. High threshold.
- LP v MP (2025 EWFC 473) Sir Nicholas Cusworth acknowledged a real risk of unfairness to victims where financial loss is hard to quantify
- Government consultation paper 5 June 2026. Amending our family finance law and properly reflecting the place of domestic abuse



Supreme Court Judgments

- Ahluwalia vs Ahluwalia 2026-05-15
(2026 SCC 16) SCJ Wagner, Richard;
- Dignity, Autonomy and Equality
- 134: Victims seek to be restored not the state they were in before each instance of abuse, but the fuller state of safety, freedom and equality that existed before the pattern began.
- 147: coercive control creates a generalised fear of FUTURE harm – *“a terror of something that might happen, rather than the fear of something specific”*.



Transparency and Privacy

- In England and Wales, and CA, the press may attend virtually every family law proceeding.
- Reporting restrictions exist

Ethics and File Conduct

- Intemperate conduct of files
- Information that may have been unlawfully obtained.
- Careless words cost lives and harm children
- Be very, very careful how you conduct your own correspondence in one of these coercive control cases. Don't make things worse.



- matrimonialisation
- how may the law develop?
- stay close to us!



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Spousal Abuse in Hong Kong *(Physical Domestic Violence)*

Azan Marwah, Barrister & Mediator

12 October 2026



SWD Guide (1)

“1.4 Intimate partner violence is a kind of domestic violence. In using violence or the threat of violence, physical or psychological harm is inflicted with the effect of establishing control by one individual over another. There are many different forms of intimate partner violence, and a person may be subjected to more than one form of violence. ...”

- Procedural Guide for Handling Intimate Partner Violence Cases
(Revised 2011)



SWD Guide (2)

- a) **Physical violence:** punching, slapping, biting, choking, kicking, burning, throwing acid, assaulting with a weapon and setting fire. Other forms of physical violence may include forcing alcohol and / or drug use, or any dangerous or harmful use of force or restraint, etc. There may be no obvious physical injuries, or there may be bruises, cuts, broken bones, internal injuries, disfigurement, disablement and even death;
- b) **Sexual violence:** coercing or attempting to coerce any sexual contact or behaviour without consent. It includes marital rape, all forms of sexual assault, or involvement in any undesirable sexual acts, etc;
- c) **Psychological abuse:** Psychological abuse is defined as recurrent aversive or coercive acts, intended to produce emotional harm or threat of harm.



SWD Guide (3)

The recurrent aversive or coercive acts can be:

- a) repeated verbal attacks
- b) verbal harassment
- c) deprivation of basic necessities
- d) intimidation or verbal threats
- e) threatening physical harm to self or others
- f) forcing isolation
- g) acts of domination
- h) repeated invalidation



SWD Guide (4)

The emotional harm / threat of harm can be:

- a) damages to the psychological well-being: lowering of self-esteem
- b) shame
- c) anxiety and terror / fear
- d) hopelessness and depression
- e) mental health problems



Victims

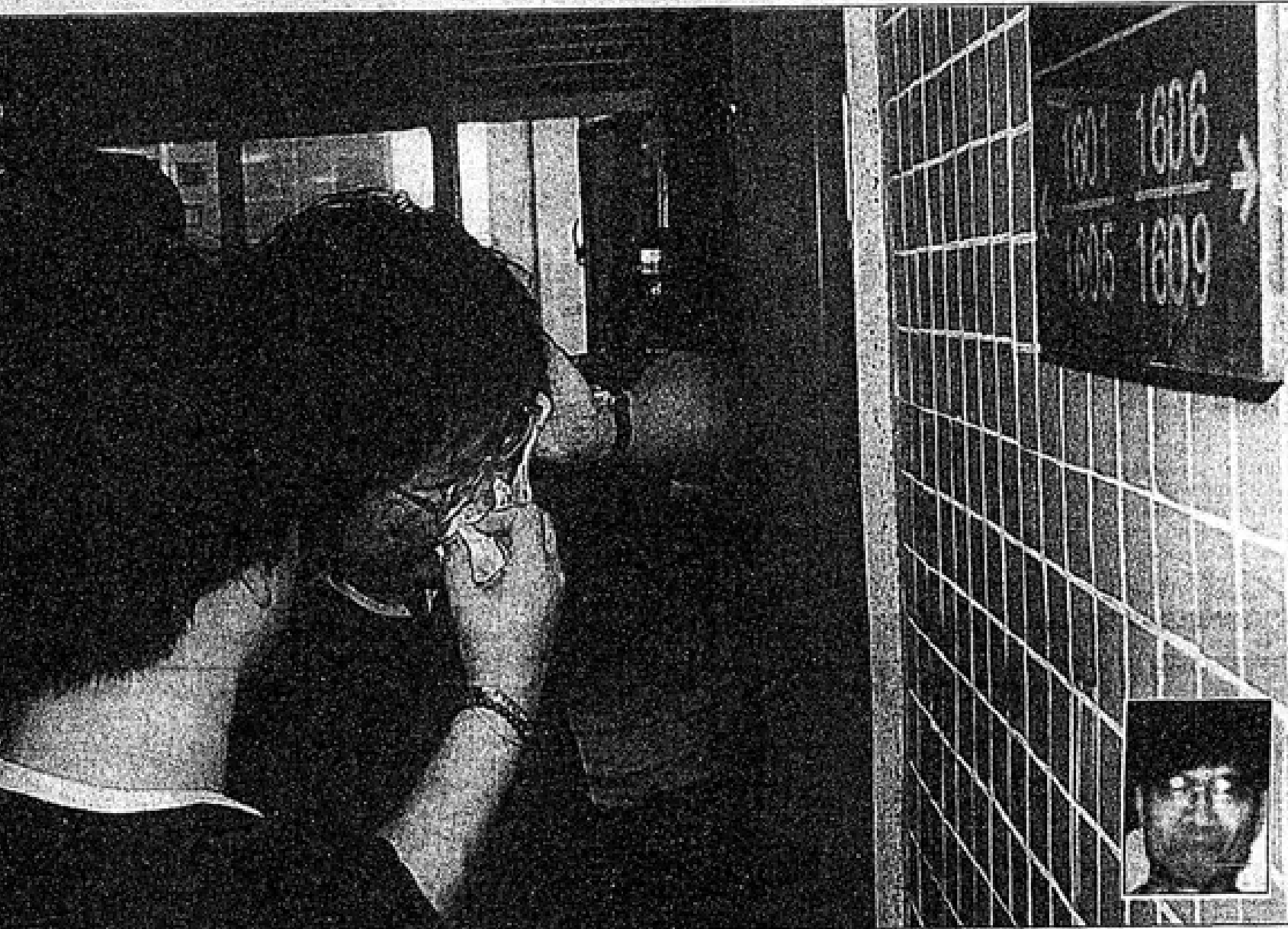
- Young and old
- Same and opposite sex couples
- Men and women
- Transgender persons
- Chinese and ethnic minorities
- Hong Kong-born and new arrivals
- Social classes and education levels



Lead up to the Tin Shui Wai tragedy

“Three boys and their parents were found dead in an apparent murder-suicide yesterday,” reported the South China Morning Post on June 10, 1999. “The bodies of Ng Jo-yin, 12, Ng Ho-yin, 10, and Ng Chung-yin, 8, were discovered on a bed with their father, Ng Chung-kit, 42, and mother, Lam Siu-ying, 39, in a Tin Shui Wai flat.

“The windows and doors of the flat were sealed and charcoal had been burned. Lam was lying to one side of the three boys, hemming them in against the wall, and Ng was lying across his wife and sons. A letter was left in the flat on the 18th floor of Shui Sum House on Tin Shui Estate. Firemen broke in after work colleagues called at the flat because Ng, a Regional Services Department cleaner, had been absent from work since Monday.”



Ricky Chung

... as they arrive at the flat after the bodies were found. Police (below) seek answers over the deaths of Ng Chung-kit (inset), his wife and three children.

Family die in murder-suicide

ALEX LO

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Firemen broke in after work colleagues called at the flat because Ng, a Regional Services Department cleaner, had been absent from work since Monday.

Yuen Long District Board member Chow Wing-kan, who knew the family, said: "Mr Ng has been working as a grade two cleaner at a Sheung Shui market since early this year.

"He had been unemployed since 1995 and found only temporary work from time to time. He came to me complaining about his livelihood and his

children's education," said Mr Chow, who saw the bodies in the flat.

"He and his family were very active and participated in district events and festivals. He had no bad habits that I know of, besides occasional gambling."

Mr Chow said he saw the family "acting normally" on Monday night, returning home after a meal out.

The mother was found in pyjamas, the eldest son in school uniform and the other two boys in T-shirts and pants.

The two older sons were pupils at Ho Ming Primary School.

The younger son attended Yeung Yat Lam Memorial School.

Senior Inspector Poon Ka-yui from Yuen Long District Crime Squad said that forensic experts were examining the bodies.

An incense burner was found in the room and all the windows were closed, with cloths and jeans used to seal the gaps.

"The room and flat were very tidy. The bodies were neatly dressed," he said.

Post-mortem examinations will be conducted today.

1999-2004 inaction

TABLE I. Number of patients presenting with intimate partner violence (IPV) per year and corresponding gender ratios*

Year	No. of IPV victims	Male	Female	Male:female
1999	183	18	165	1:9
2000	230	29	201	1:7
2001	338	43	295	1:7
2002	332	35	297	1:8
2003	323	46	277	1:6
2004	289	37	252	1:7
Total	1695	208	1487	1:7

* Based on calculation from year 2001 to 2004, M:F ratio=1:7, no significant difference between years (Yates Chi squared test, P=0.64)

Lau et al. '1700 Victims of intimate partner violence: Characteristics and clinical outcomes' Hong Kong Medical Journal, 2008, v. 14 n. 6, p. 451-457

NB: This was a survey of only a fraction (~10%) of the total reported cases.

Physical Abuse

E.g. (per Lau et al)

TABLE 2. Types of injuries associated with intimate partner violence

Type of injury	No.
Tenderness	810 (48%)
Erythema	173 (10%)
Haematoma/bruise	539 (32%)
Abrasion	360 (21%)
Laceration/cut	112 (7%)
Nasal bone fracture	5 (0.3%)
Limb fracture	13 (0.8%)
Scald/chemical burns	8 (0.5%)
Ruptured tympanic membrane	16 (0.9%)
Epistaxis	8 (0.5%)
Life-threatening injuries	15 (0.9%)
Neck strangulation	6
Severe head injury	5
Chopped by knife	3
Pulled to fall from a height	1
No wound	30 (2%)



Prevalence

- K.L. Chan (2005), *Study on Child Abuse and Spouse Battering: Report on findings of Household Survey*

Physical assault, injury or sexual coercion against a spouse: 21.7% of households

Physical violence against children: 29% of children

Far more than recorded!



Tragedy that provoked reaction

Victims: Kim Shuk-ying (31) and her two daughters, Li Yin-li (6) Li Tsz-wan (5).

Perpetrator: The husband/father, Li Pak-sum (44), who attacked them at their public housing flat, and who later died in the hospital after self-inflicted injuries.

- **February–April 2004:** Kim repeatedly sought help from social welfare agencies, the police, and a district councillor, reporting fears for her safety, suspected abuse, and death threats from her husband.
- **April 9, 2004:** After a domestic dispute where Kim cut her foot on broken glass, she called 999 and was sent to a shelter. Responding police officers treated it as a minor family dispute and did not pursue a criminal investigation.
- **April 11, 2004:** Kim returned to the flat to retrieve her daughters after hearing her husband threatened to take them to the mainland. Hours after visiting a local police station where she was refused an escort, she and her daughters were stabbed to death.



Reaction to the Tragedy

Public inquiry.

Review of policies and legislation relating to:

- Family law (including injunctions, custody etc.)
- Criminal law, including police and prosecution
- Child protection policies, including and the establishment of the Child Death Review Panel



Criminal Procedure

- Burden of proof: Prosecution
- Standard: 'beyond reasonable doubt'



Criminal Procedure

- Prosecution Policy

17. Domestic Violence Cases

17.1 Prosecutors should have regard to *Guidelines for Prosecuting Domestic Violence Cases* of the Prosecutions Division.

17.2 In prosecuting domestic violence cases, the prosecution must consider the safety of the victim, any children and other persons involved, the situation of the family and the likely effect of any prosecution on its members.

17.3 Domestic violence may become more frequent and serious the longer it continues. Accordingly, a prosecution may be required, according to the standard criteria, even if a victim does not wish it to proceed. In making such decisions the prosecution is obliged to take into account the security of the persons at risk and the public interest.



Prosecution Policy contd.

17.4 The prosecution should take into account, when deciding on the course to be taken:

- a) the objective seriousness of the alleged offending behaviour, including any use of a weapon, and the use of alcohol or drugs;*
- b) the victim's injuries (physical and/or psychological);*
- c) the risk of the accused reoffending;*
- d) any planning of the alleged offence;*
- e) any threats made before or after the alleged offence;*
- f) the presence of children during the alleged offending;*
- g) any continuing threat to the health and safety of the victim or anyone else involved;*
- h) the current state of the relationship between the accused and the victim;*
- i) the history of the relationship, especially concerning any past violence;*
- j) the accused's criminal history, especially in connection with offences of violence.*



Prosecution Policy contd.

17.5 *If a victim is unwilling to testify, a decision to compel testimony requires serious consideration, and where the victim is the spouse of the accused, reference will need to be made to sections 57 and 57A of the Criminal Procedure Ordinance, Cap. 221. The prosecutor may by consent use the victim's statement in evidence without requiring the victim to testify, under section 65B of the Criminal Procedure Ordinance, Cap. 221 and should consider whether any special procedures should be used.*



Criminal Procedure

Evidence

Common law rule amended: ss.57 and 57A Criminal Procedure Ordinance, Cap. 221 (**CPO**) (spouse competent and compellable, request exemption)

Video interviews: “Achieving Best Evidence” / “Memorandum of Good Practice”

CPO Part IIIA (evidence in chief by VRI, cross examination by video-link)

Live Television Link and Video Recorded Evidence Rules, Cap.221J

Rule 3: support person



Criminal Procedure

Video Recorded Interviews

- Ensure the first interview can be used at trial (to reduce trauma)
- Interview should take place as soon as practicable
- Sympathetically designed suites
- By trained SWO, police officer, clinical psychologists
- Independent adult
- Ensure suspect is not present
- Explain process and build a rapport
- Let the child give a narrative account
- Use open non-leading questions
- Close the interview with rapport questions
- Check the child understands and is not distressed



Domestic Violence Injunctions

DCRVO, Cap. 189



DCRVO Orders

- Non molestation order
- Ouster/re-entry order
- Authorization of arrest
- Counseling programme
- Vary child custody/access



Parties

- Spouse/former spouse (s.3)
- Specified minor (s.3)
- 'Cohabitation relationship' current and former (s.3B)
- Relatives (s.3A)



“Cohabitation Relationship”

(s.2) ...a relationship between 2 persons (whether of the same sex or of the opposite sex) who live together as a couple in an intimate relationship

To establish a “cohabitation relationship” ...

Consider all the circumstances of the case, including (s.3B(2)):

- (a) whether the parties are living together in the same household;*
- (b) whether the parties share the tasks and duties of their daily lives;*
- (c) whether there is stability and permanence in the relationship;*
- (d) the arrangement of sharing of expenses or financial support, and the degree of financial dependence or interdependence, between the parties;*
- (e) whether there is a sexual relationship between the parties;*
- (f) whether the parties share the care and support of a specified minor;*
- (g) the parties’ reasons for living together, and the degree of mutual commitment to a shared life;*
- (h) whether the parties conduct themselves towards friends, relatives or other persons as parties to a cohabitation relationship, and whether the parties are so treated by their friends and relatives or other persons.*



Molestation: Definitions

- “To cause trouble; to vex; to annoy, to put to inconvenience”, Davies LJ in *Vaughan v. Vaughan* [1973] 3 All ER 449
- “Molest is a wide, plain word which I would be reluctant to define or paraphrase. If I had to find one synonym for it, I would select ‘pester’.” Stephenson LJ in *Vaughan v. Vaughan* [1973] 3 All ER 449
- “... molestation may take place without the threat or use of physical violence and still be serious and inimical to mental and physical health”, Viscount Dilhorne in *Davis v. Johnson* [1979] AC 264
- “It applies to any conduct which can properly be regarded as such a degree of harassment as to call for the intervention of the court”, per Ormrod LJ in *Horner v. Horner* [1982] Fam 90



Molestation: Examples

- Physical violence, threats, psychological abuse, sexual abuse, financial abuse, verbal abuse, bullying, nuisance calls/text messages/emails, unwelcome visits, following/watching/stalking, property damage, publishing insulting material, improper reports to authorities...
- Personally or by agents



Mandatory Counseling

Jurisdiction: ss 3(1A), 3A(5), and 3B(3), DCRVO

Anti-Violence Programme, 5 core concepts:

- Rapport building and ownership
- Control and monitoring of violence
- Self-understanding (learn, confront and challenge)
- Emotional control skills training
- Relapse prevention skills

12 x 2-3 hour sessions



Authorization of Arrest

Test:

- Has caused actual bodily harm (civil standard!)
- Reasonably believes respondent is likely to cause actual bodily harm

“any hurt or injury calculated to interfere with the health or comfort of the victim” – *R v. Miller* [1954] 2 QB 282



Ouster and Re-entry

- Ouster can cover ANYWHERE:
e.g. home, work, recreation or study
- Re-entry covers residence/matrimonial home
- Does not require proprietary interest in the specified area

(but can still be frustrated)



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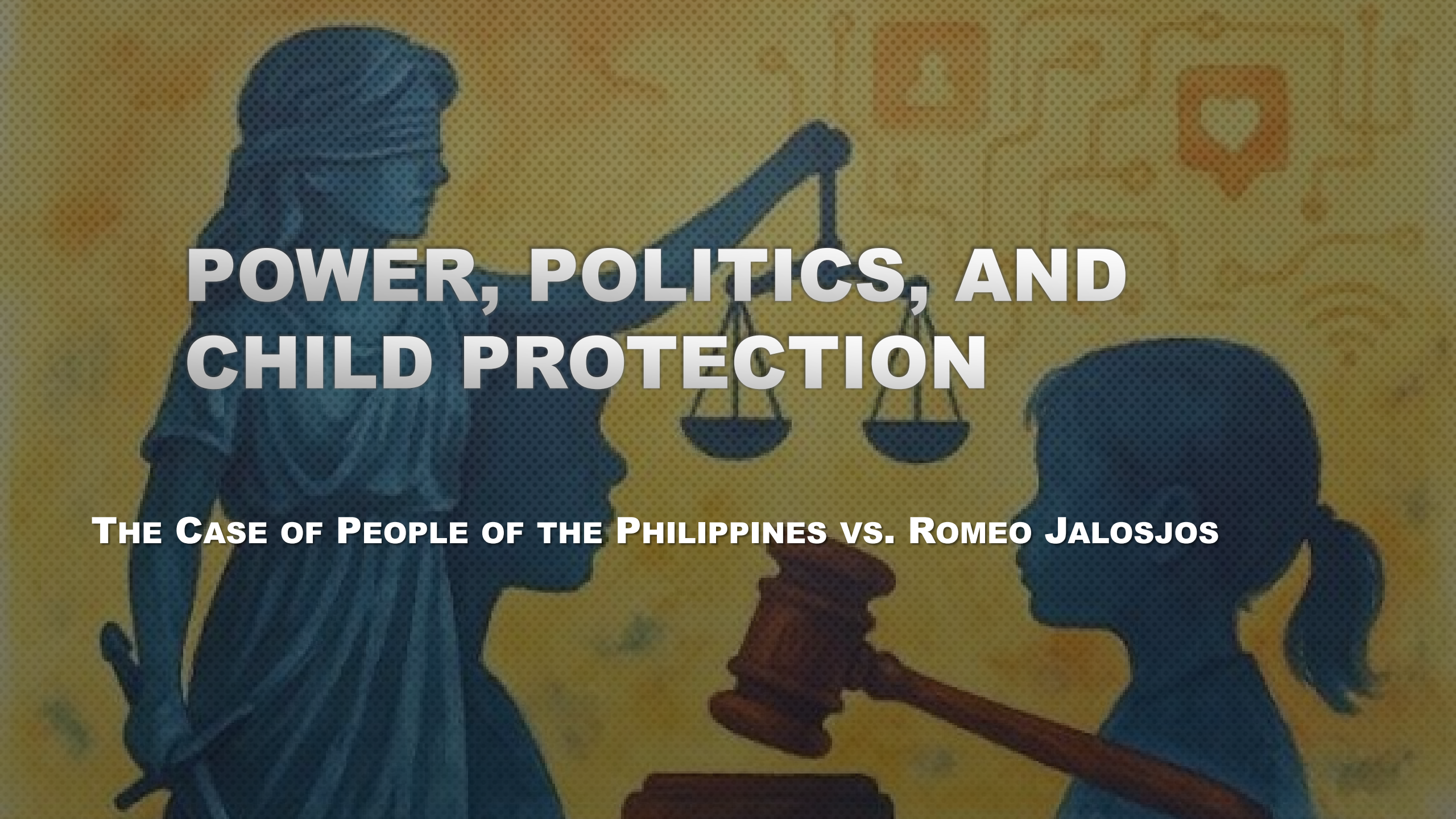
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POWER, POLITICS, AND CHILD PROTECTION

THE CASE OF PEOPLE OF THE PHILIPPINES VS. ROMEO JALOSJOS

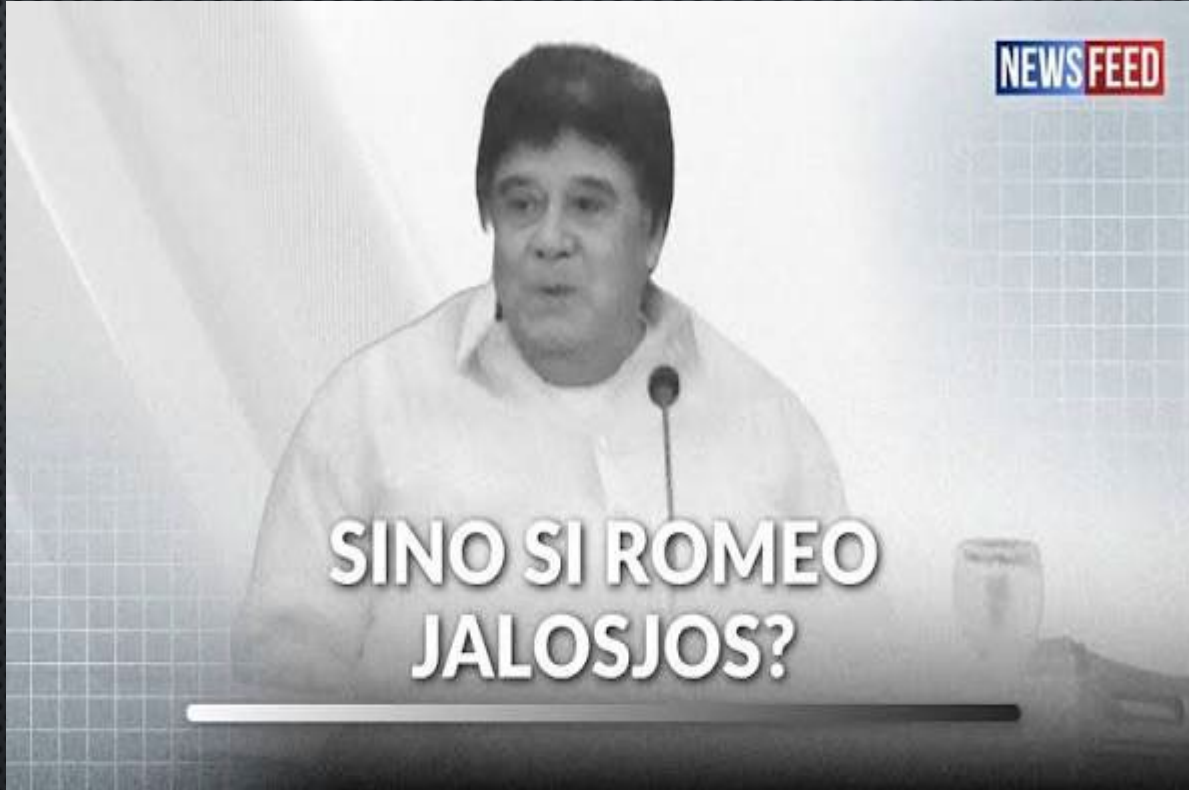
PEOPLE OF THE PHILIPPINES vs ROMEO G. JALOSJOS



A LANDMARK CASE IN PHILIPPINE LEGAL HISTORY ILLUSTRATING:

- **THE RULE OF LAW vs POLITICAL INFLUENCE**
- **THE TREATMENT OF HIGH-PROFILE INMATES**
- **JUSTICE FOR A CHILD ABUSE VICTIM AND A RAPIST**

THE PERPETRATOR: ROMEO G. JALOSJOS



- Representative, 1st district, Zamboanga del Norte.
- **Television producer and one of the founders of Television and Production Exponents Inc. (TAPE INC.)**
- **Owner of Dakak, a white-sand beach property, formerly a major luxury resort located in Zamboanga del Norte.**

THE VICTIM: ROSILYN DELANTAR

- **Born 11 May 1985**
- **In 1996, she was 11 years old when Simplicio Delantar prostituted her.**
- **Simplicio first brought her to an “ARABO”, twice**
- **Simplicio brought Rosilyn to Jalosjos who asked if she was really 11 years old**
- **From then on, Rosilyn was brought exclusively to Congressman Jalosjos at his Ritz Tower Condominium where he repeatedly abused her, after which he would give her money to buy stuff**



THE PIMP: SIMPLICIO DELANTAR



- **Falsified Rosilyn Delantar's Birth Certificate by registering himself as the father and his sister, Librada Platon as the mother**
- **Pimped Rosilyn to Congressman Jalosjos who paid him P10,000.00- P20,000.00 per visit**
- **Testified for Congressman Jalosjos by disputing Rosilyn's age, claiming that she was really 14 years old when he brought her to Congressman Jalosjos**
- **Was Charged and convicted of Child Abuse, now serving Sentence at the National Bilibid Prison**

ROSILYN FILES A COMPLAINT WITH THE POLICE



- With the help of Yamie, a boarder in Simplicio's boarding house, Rosilyn fled.
- Yamie learned that she was going to be charged with kidnapping if she did not return Rosilyn.
- Rosilyn reported to the Pasay City Police that she was being prostituted by Simplicio and cited an unidentified "Arabo" and Congressman Jalosjos as her "clients"
- A Pasay City policeman called Congressman Jalosjos and informed him that a complaint had been filed against him
- Jalosjos reportedly dismissed it as nothing more than a child prostitute who just wanted more money

HOW THE DSWD PROTECTED ROSILYN



- **THE DEPARTMENT OF SOCIAL WELFARE AND DEVELOPMENT WAS THE LEAD AGENCY**
- **TOOK PROTECTIVE CUSTODY OF ROSILYN**
- **ENGAGED THE SERVICES OF PRIVATE LAWYERS**
- **FILED A PETITION TO TERMINATE SIMPLICIO'S PARENTAL AUTHORITY OVER ROSILYN**
- **EXTENDED PSYCHOSOCIAL SERVICES TO ROSILYN**
- **ENSURED THAT ROSILYN WOULD CONTINUE HER SCHOOLING**
- **ARRANGED ROSILYN'S CHANGE OF IDENTITY AND ADOPTION AFTER SHE TESTIFIED**

HOW THE DOJ PROTECTED ROSILYN



- **The Department of Justice led the prosecution of Congressman Jalosjos**
- **Then Secretary Teofisto Guingona transferred the preliminary investigation from the Makati Prosecutor's Office to the DOJ Central office**
- **He created a special panel of prosecutors for the preliminary investigation**
- **He assigned the Chief State Prosecutor to personally handle the prosecution of Jalosjos**
- **Rosilyn was placed under the Witness Protection Program**
- **Rosilyn was given compensation under the Victim Compensation Act**

HOW THE COURT SYSTEM PROTECTED ROSILYN



- **THE MAKATI REGIONAL TRIAL COURT JUDGE SCHEDULED CONTINUOUS TRIAL FROM MONDAY TO THURSDAY**
- **NO OTHER CASES WERE SCHEDULED**
- **THE PUBLIC WAS EXCLUDED FROM THE COURTROOM**
- **THE JUDGE ALLOWED ROSILYN TO TESTIFY IN ENGLISH AND FILIPINO**
- **THE PROCEEDINGS FROM ARRAIGNMENT TO PROMULGATION OF THE DECISION TOOK EXACTLY 450 DAYS**

HOW JALOSJOS WAS ARRESTED



- **AFTER A WARRANT WAS ISSUED FOR HIS ARREST, JALOSJOS WENT INTO HIDING**
- **HE WAS ARRESTED THRU THE COMBINED EFFORTS OF THE POLICE, THE NATIONAL BUREAU OF INVESTIGATION AND THE PRESIDENTIAL SECURITY GROUP ON AN ISLAND OFF BAGAC, BATAAN ON 17 JANUARY 1997.**

THE CONVICTION OF JALOSJOS



- **JALOSJOS WAS DETAINED AT THE MAKATI CITY JAIL DURING HIS TRIAL**
- **HE WAS CONVICTED ON 2 COUNTS OF STATUTORY RAPE AND 6 COUNTS OF ACTS OF LASCIVIOUSNESS**
- **HE WAS SENTENCED TO 2 RECLUSION PERPETUA AND 6 RECLUSION TEMPORAL AND TRANSFERRED TO THE NATIONAL BILIBID PRISON TO SERVE HIS SENTENCE**
- **HE WAS ORDERED TO PAY CIVIL INDEMNITY AND MORAL DAMAGES TO THE VICTIM.**

ROGUE ELEMENTS

- **A MANILA COURT CANCELED ROSILYN'S BIRTH CERTIFICATE WITHOUT DUE PROCESS. HOWEVER, THE DECISION STATED THAT SHE WAS BORN 11 MAY 1985, MAKING HER 11 YEARS AT THE TIME SHE WAS ABUSED BY JALOSJOS**
- **2 NBI AGENTS ATTEMPTED TO TAMPER WITH THE PROSECUTION EVIDENCE**
- **ROSILYN'S ALLEGED BIOLOGICAL MOTHER FILED A PETITION FOR HABEAS CORPUS IN HER ATTEMPT TO RECOVER THE CUSTODY OF ROSILYN, CLAIMING THAT SHE ONLY LEFT HER IN SIMPLICIO'S CARE AND DID NOT REALLY ABANDON THE CHILD**
- **DOMINADOR JALOSJOS, THE BROTHER OF ROMEO JALOSJOS, CLAIMED THAT IT WAS HIM THAT ROSILYN MET, AND NOT THE CONGRESSMAN**
- **DEFENSE WITNESSES INCLUDING BARANGAY OFFICIALS, A NEWSPAPER REPORTER, AND EVEN A CATHOLIC PRIEST TESTIFIED THAT JALOSJOS WAS IN ZAMBOANGA DEL NORTE ON THOSE DATES THAT ROSILYN SAID SHE WAS ABUSED BY JALOSJOS.**

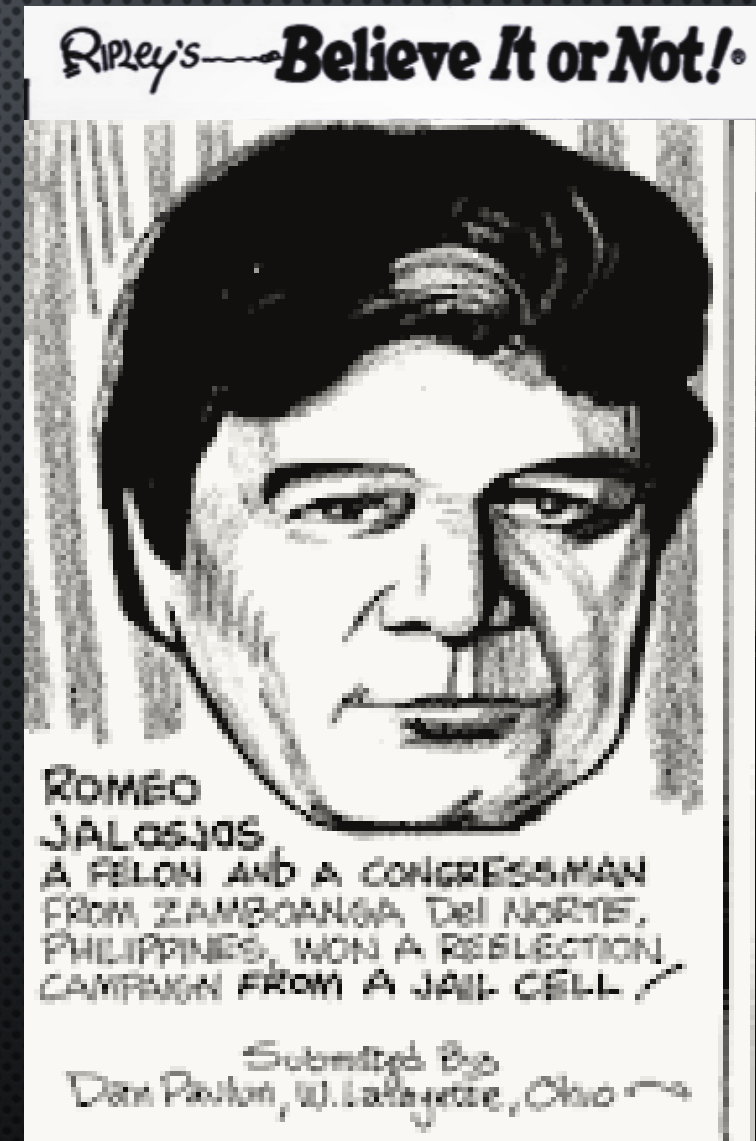
AFTER JALOSJOS WAS CONVICTED BY THE RTC

He appealed his conviction to the Supreme Court which denied his appeal.

He was re-elected congressman in 1998 and 2001

He petitioned the Supreme Court to allow him to attend Congress while in detention, which the Supreme Court denied

He was removed by Congress when the Supreme Court affirmed his conviction with finality



POLITICAL POWER PLAYS



- **1996 – FIDEL V. RAMOS GAVE HIS FULL SUPPORT TO THE DSWD AND THE DOJ**
- **FVR ORDERED THE PSG TO LEAD THE MANHUNT FOR JALOSJOS**
- **HE ALLOWED ROSILYN TO BE HOUSED IN THE PSG COMPOUND AT THE MALACAÑANG GROUNDS**



- **2001 – JOSEPH ESTRADA WAS A POLITICAL ALLY AND CLOSE PERSONAL FRIEND OF JALOSJOS**
- **ESTRADA WAS IMPEACHED AND HE RESIGNED AS PRESIDENT BEFORE HE COULD BE CONVICTED**
- **GLORIA MACAPAGAL-ARROYO, THEN VICE PRESIDENT, ASSUMED THE PRESIDENCY**

POLITICAL POWER PLAYS



- **1997 – THEN SENATOR GLORIA MACAPAGAL-ARROYO VISITED JALOSJOS AT THE MAKATI CITY JAIL AND WAS CRITICIZED BY THE MEDIA AND WOMEN’S GROUPS**
- **2007 – THEN PRESIDENT GLORIA MACAPAGAL-ARROYO COMMUTED JALOSJOS’S SENTENCE TO 16 YEARS**
- **2009 – WITH GOOD CONDUCT TIME ALLOWANCE (GCTA) APPLIED, JALOSJOS WAS OFFICIALLY RELEASED AFTER SERVING ONLY 11 YEARS**



VIP TREATMENT FOR JALOSJOS

- **INSIDE THE NBP:**
 - **HE HAD CELLPHONES AND HIS OWN CUSTOMIZED COTTAGE WITH LUXURY AMENITIES, EX. TREADMILL, AIRCONDITIONED ROOMS, AND TELEVISION SETS**
 - **HE FINANCED THE CONSTRUCTION OF A LARGE TENNIS COURT, A GYMNASIUM, A BASKETBALL COURT, A PLAYGROUND, A HAMBURGER STORE, A BAKERY, A CUSTOMIZED WATER TANK AND EVEN A RELIGIOUS ALTAR.**
 - **HE HOSTED EXTRAVAGANT PARTIES, WHICH WERE ATTENDED BY SHOWBIZ PERSONALITIES AND HAD CATERED FOOD FOR THOUSANDS OF INMATES.**



VIP TREATMENT FOR JALOSJOS

- **OUTSIDE THE NBP:**
 - **HE BUILT THE TENNIS ACADEMY OF THE PHILIPPINES**
 - **HE OWNED AND OPERATED A RESTO-BAR IN KATARUNGAN VILLAGE WHERE HE WAS PERMITTED TO STAY IN HIS OWN PRIVATE RESIDENCE.**
 - **HE CONTINUED TO FUNCTION AS AN OFFICER OR CHAIR OF VARIOUS CORPORATE ENTITIES, THUS EARNING AN INCOME.**
- **BY 2007, HE WAS CONSIDERED TO HAVE SERVED THE MINIMUM PERIOD OF 16-YEARS REQUIRED TO AVAIL OF COMMUTATION OF HIS SENTENCE BECAUSE OF THE GCTA HE OBTAINED**
- **HE WAS PREMATURELY RELEASED AND WAS ABLE TO FLY BY PRIVATE PLANE TO HIS DAKAK RESORT BUT DUE TO PUBLIC OUTRAGE, HE WAS REARRESTED AND RETURNED TO JAIL**

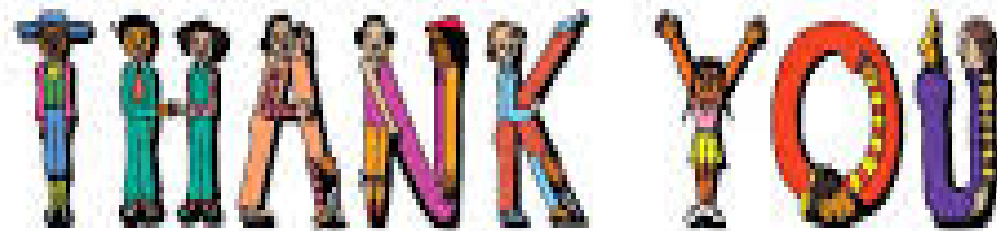
DID ROSILYN GET JUSTICE?

- **ROSILYN'S ABUSER WAS JAILED**
- **IN 2009, SHE CAME BACK TO THE PHILIPPINES AND RECEIVED ₱800,000.00 IN CASH , THE CIVIL INDEMNITY AND MORAL DAMAGES AWARDED BY THE COURT.**
- **SHE IS NOW LIVING ABROAD WITH HER HUSBAND AND CHILDREN**
- **AS A RESULT OF THE EXPERIENCES GLEANED FROM THIS CASE, THE LEGISLATURE AND THE SUPREME COURT INSTITUTED VARIOUS REFORMS OF THE JUSTICE SYSTEM SUCH AS THE CHILD WITNESS RULE, SEXUAL ABUSE SHIELD RULE, RAPE VICTIM COMPENSATION AND PROTECTION ACT. THESE ARE IN ADDITION TO EARLIER LAWS FOR THE PROTECTION OF CHILDREN SUCH AS THE FAMILY COURT ACT, THE CHILD ABUSE LAW, AND THE AMENDED RAPE LAW**

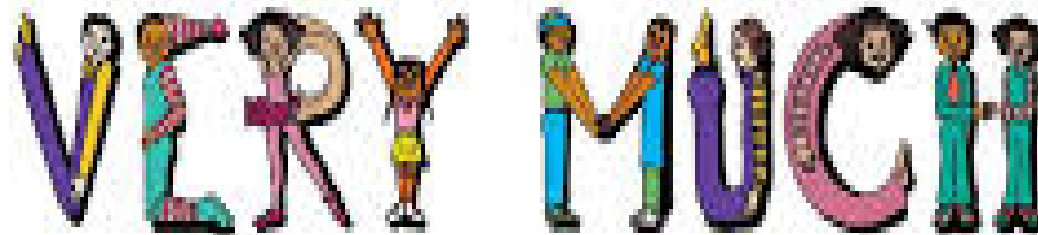
WAS JUSTICE DONE?

- **JALOSJOS WAS JAILED FOR 11 YEARS, NOT 40 YEARS WHICH WAS HIS SENTENCE DECREED BY THE COURT**
- **IN 2009, JALOSJOS PAID ₱800,000.00 IN CASH, AS ONE OF THE CONDITIONS FOR HIS RELEASE**
- **JALOSJOS WAS PERMANENTLY DISQUALIFIED FROM RUNNING FOR ANY ELECTED POSITION. HOWEVER, JALOSJOS FAMILY MEMBERS RAN FOR AND WON VARIOUS POSITIONS IN ZAMBOANGA DEL NORTE. HOWEVER, IN THE 2025 MID-TERM ELECTIONS, THE JALOSJOS FAMILY LOST THE ELECTIONS, SIGNALING THE END OF THE JALOSJOS DYNASTY**
- **ON 02 AUGUST 2026, JALOSJOS, 85 YEARS OLD, DIED**





THANK YOU



VERY MUCH

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