

Title: People of the Philippines v. Raul Del Rosario y Niebres

Facts:

Raul Del Rosario was charged with the crimes of Illegal Sale of Dangerous Drugs (Sec. 5, Article II of R.A. No. 9165) and Illegal Possession of Dangerous Drugs (Sec. 11, Article II of R.A. No. 9165). The incidents took place on April 21, 2008, at Barangay Pansol, Calamba City. He allegedly sold 0.01 gram of Methamphetamine Hydrochloride (“shabu”) to a poseur buyer and possessed an additional 0.09 grams of the same substance.

At his arraignment, Del Rosario pleaded not guilty and trial commenced. The prosecution presented two witnesses: SPO1 Apolonio Naredo, the arresting officer, and Forensic Chemist Lalaine Ong Rodrigo. They testified to a buy-bust operation which led to Del Rosario’s arrest and seizure of shabu.

Del Rosario’s defense was a denial. He claimed he was arrested at his hut without evidence, forced into a jeep, taken to various locations, and shown the supposed seized drugs. A neighbor, Rosita Mangundayao, confirmed hearing noises and seeing Del Rosario being handcuffed.

The RTC found Del Rosario guilty beyond reasonable doubt, giving weight to the presumption of regularity in official functions and finding the prosecution successfully established the crimes’ elements. It disregarded the defense’s claims due to inconsistencies and dubbed them as standard defense ploys.

On appeal, the Court of Appeals affirmed the RTC’s decision despite Del Rosario’s argument pointing out non-compliance with the required procedures under Sec. 21, Article II of R.A. No. 9165.

Issues:

1. Whether or not the guilt of Raul Del Rosario for the offenses charged has been proven beyond reasonable doubt.

Court’s Decision:

The Supreme Court reversed the decision of the Court of Appeals, granting Del Rosario’s appeal. The High Court found a total failure by the buy-bust team to comply with the chain of custody rule stipulated by Sec. 21, Article II of R.A. No. 9165. There was no physical

inventory or photograph taken in the presence of legally required witnesses, such as a representative from the media, the DOJ, or an elected public official.

The Court observed that the chain of custody was compromised at various points: the handover from the arresting officer to the investigating officer; the delivery to the forensic chemist; and the movement from testing to the court. The prosecution did not adequately explain these lapses or establish with certainty that the integrity and evidentiary value of the evidence were preserved.

Doctrine:

The case reiterates the doctrine of the chain of custody rule, emphasizing that strict compliance with the procedural requirements set forth in Sec. 21, Article II of R.A. No. 9165 is essential to ensure the integrity of the seized evidence and uphold the presumption of innocence.

Class Notes:

- Chain of Custody Rule: The prosecution must demonstrate an unbroken chain of custody over the drugs to establish their identity.
- Compliance with Sec. 21, R.A. No. 9165: Immediate inventory and photographing of seized drugs in the presence of mandatory witnesses.
- Justifiable grounds for non-compliance must be proven for the saving clause to apply.

Historical Background:

This case highlights the stringent requirements for the prosecution in drugs-related cases in the Philippines, based on the Comprehensive Dangerous Drugs Act of 2002 (R.A. No. 9165). The jurisprudence emphasizes the importance of adherence to procedural safeguards to prevent planting of evidence and miscarriage of justice.