

Title: People of the Philippines v. Salvador Sanchez y Espiritu

Facts:

Salvador Sanchez y Espiritu was charged with violating Section 5, Article II of R.A. No. 9165 for selling 0.02 grams of methamphetamine hydrochloride (shabu). He pleaded not guilty. SPO2 Levi Sevilla, acting as poseur buyer, conducted a buy-bust operation in Quezon City, wherein he acquired a sachet of shabu from the appellant in exchange for PHP 100 marked money. After the transaction, Sanchez was arrested and the marked money recovered from him. The seized substance was confirmed as shabu by a forensic chemist, although the court dispensed with the chemist's testimony.

Procedural Posture:

After the RTC found Sanchez guilty, sentencing him to life imprisonment with a fine of PHP 50,000, Sanchez appealed to the CA, which affirmed the RTC's decision. Sanchez then brought the case to the Philippine Supreme Court.

Issues:

1. Whether the buy-bust operation was legitimately conducted.
2. Whether there was compliance with the requirements under Section 21, Article II of RA 9165.
3. Whether the chain of custody of the seized evidence was properly established.
4. Whether SPO2 Sevilla's credibility as a witness was satisfactorily established given his apparent lack of adherence to procedure.

Court's Decision:

The Supreme Court acquitted Sanchez due to reasonable doubt, stemming from procedural lapses in the handling of the seized illegal drug which affected the integrity of the evidence. The Court determined that the prosecution failed to observe the mandatory procedure of Section 21, Article II of RA 9165, including immediate inventory and photographing of the seized drugs in the presence of specified individuals, and a clear record of the chain of custody. The Court also found that Sevilla's handling of the drugs post-arrest did not meet the standards necessary for maintaining the evidentiary value necessary for proving Sanchez's guilt beyond a reasonable doubt.

Doctrine:

The Supreme Court reiterates the importance of strict compliance with Section 21 of RA 9165 and its implementing rules, emphasizing that non-compliance under justifiable

grounds must preserve the integrity and evidentiary value of the items. Moreover, the case emphasizes that the constitutional presumption of innocence cannot be overcome by the presumption of regularity in the performance of official duties when substantial lapses in police procedure are apparent.

Class Notes:

- The presumption of innocence is a fundamental right of an accused.
- The prosecution bears the burden of proof beyond reasonable doubt.
- In drug-related cases, adherence to Section 21 of RA 9165, ensuring a proper chain of custody, is crucial to establish corpus delicti.
- The “chain of custody” rule ensures that the evidence presented in court is the same as that seized during the operation.
- “Marking” of the seized items immediately upon confiscation is essential for maintaining the integrity of the evidence.
- The presumption of regularity in the performance of official duty is rebuttable, and it does not prevail over the presumption of innocence.

Historical Background:

This case reflects the Philippine judiciary’s response to concerns over the credibility of buy-bust operations, especially given the potential for abuse and the severe penalties for drug offenses. The Supreme Court’s decision serves to curb possible miscarriages of justice by strictly enforcing procedural rules that protect the rights of individuals and the integrity of the judicial process.