

### Title: The People of the Philippines vs. Rogelio Mengote y Tejas

### Facts:

On August 8, 1987, the Western Police District was alerted by an informer about three suspicious-looking individuals at the corner of Juan Luna and North Bay Boulevard, Tondo, Manila. Responding to the call, plainclothes policemen observed two men, including Rogelio Mengote, behaving in a manner deemed suspicious, which led to their warrantless arrest. At the time of arrest, Mengote was found in possession of a .38 caliber Smith and Wesson revolver with six live bullets. This discovery prompted the filing of a case against Mengote for violating Presidential Decree No. 1866, specifically for the illegal possession of a firearm. The case underwent trial at the Regional Trial Court of Manila, where Mengote's conviction was ultimately secured, largely due to the evidence of the unlicensed firearm found on his person. Mengote appealed his conviction, challenging the admissibility of the seized firearm on the grounds that it was obtained through an illegal search and seizure.

### Issues:

1. Whether the warrantless arrest of Rogelio Mengote was lawful.
2. Whether the seizure of the firearm from Mengote was valid, making it admissible evidence.
3. The relevancy and admissibility of testimonial evidence regarding the robbery at Danganan's house and Mengote's supposed involvement.

### Court's Decision:

The Supreme Court closely analyzed the legality of Mengote's arrest and the subsequent seizure of the firearm found in his possession. The Court found that the conditions for a lawful warrantless arrest under Rule 113, Section 5 of the Rules of Court were not met, particularly since Mengote's behavior at the time did not conclusively indicate he had committed, was committing, or was about to commit a crime in the presence of the arresting officers. The Court also emphasized that probable cause for the arrest and the seizure of the firearm was lacking, rendering the evidence obtained therefrom inadmissible per the exclusionary rule established by the Constitution. Consequently, without the firearm as evidence, the prosecution's case against Mengote for illegal possession of firearms was significantly weakened. Thus, the Supreme Court reversed the lower court's decision and acquitted Mengote.

### Doctrine:

This case reinforced the doctrine regarding the inadmissibility of evidence obtained through

illegal search and seizure, in line with the protection of individual rights against unreasonable searches and seizures under Article III, Section 3(2), of the Philippine Constitution. It emphasized the need for law enforcement officers to observe constitutional rights and requirements for a lawful arrest and seizure to prevent crucial evidence from being excluded in criminal prosecutions.

### Class Notes:

- Warrantless Arrest: Lawful only if the person to be arrested has committed, is committing, or is attempting to commit an offense in the presence of the arresting officer (Rule 113, Section 5, Rules of Court).
- Exclusionary Rule: Evidence obtained via an unlawful arrest or seizure is inadmissible in any proceeding (Article III, Section 3(2), Philippine Constitution).
- Probable Cause for Arrest: Requires that an actual offense has been committed and that the person to be arrested has committed it, based on personal knowledge of the arresting officer.

### Historical Background:

This case highlights the tension between police authority and individual rights, particularly in scenarios involving suspicion-based arrests and seizures without warrants. It serves as a significant reminder of the judiciary's role in upholding constitutional rights and limiting law enforcement practices that infringe upon individual freedoms.