

Title:

People of the Philippines v. Rafael Sta. Maria y Indon

Facts:

On November 27, 2002, P/Chief Insp. Noli Pacheco received an intelligence report about illegal drug activities by “Fael,” later identified as Rafael Sta. Maria, in San Rafael, Bulacan. A surveillance team negotiated a drug deal for the purchase of shabu (methamphetamine hydrochloride) from Sta. Maria. On November 29, 2002, PO1 Rhoel Ventura, acting as a poseur-buyer with marked money, bought shabu from Sta. Maria, leading to Sta. Maria’s arrest.

Sta. Maria’s defense contended that on the day of the arrest, he was at home with Zedric dela Cruz, dealing with a cellphone sale and a loan payment. He claimed that the police unlawfully entered his home and falsely accused him of selling drugs.

Sta. Maria was found guilty by the Regional Trial Court (RTC) of Bulacan for violating Section 5, Article II of Republic Act No. 9165, sentenced to life imprisonment, and fined P500,000. His appeal was transferred from the Supreme Court to the Court of Appeals per the People v. Mateo ruling, where his conviction was affirmed.

Issues:

1. Whether the arrest of Sta. Maria constituted instigation rather than a valid buy-bust operation.
2. Whether the buy-bust operation’s legality was compromised due to purported violations of Sections 21 and 86 of Republic Act No. 9165.
3. Whether the evidence obtained against Sta. Maria was admissible.

Court’s Decision:

1. The Supreme Court found that the operation was a legitimate entrapment, not instigation. Sta. Maria’s prior agreement to sell drugs was seen as indicative of his habitual illegal drug trade.
2. The court held that non-participation of the Philippine Drug Enforcement Agency (PDEA) in the operation did not invalidate the arrest nor render the evidence inadmissible. Under Section 86 of Republic Act No. 9165 and its IRR, other law enforcement agencies can still conduct anti-drug operations as long as cases are eventually transferred to PDEA.
3. The Supreme Court ruled that non-compliance with the strict procedures of Section 21 regarding the custody and disposition of confiscated items, under justifiable grounds, was

not fatal to the prosecution's case. The appeal to invalidate evidence based on procedural lapses was not raised at the trial level and could not be entertained on appeal.

Doctrine:

This case reinforces the principle that in drug-related operations, the distinction between entrapment and instigation determines the legality of law enforcement actions. Furthermore, it establishes that the involvement of PDEA, while preferable, is not strictly mandatory for the validity of a drug buy-bust operation, provided that other law enforcement agencies eventually coordinate with or transfer relevant cases to PDEA.

Class Notes:

1. **Entrapment vs. Instigation**: Entrapment involves law enforcers catching a person committing a crime through ways and means. In contrast, instigation occurs when law enforcers induce a person to commit a crime, becoming co-principals.
2. **Republic Act No. 9165, Section 5**: This section penalizes unauthorized sale, trade, administration, dispensation, delivery, and transportation of dangerous drugs.
3. **Republic Act No. 9165, Section 21 & 86**: Section 21 outlines the procedure for the custody of confiscated drugs, while Section 86 defines the role of PDEA in drug enforcement and mandates coordination among law enforcement agencies.
4. **Admissibility of evidence**: Non-compliance with the procedural requirements under RA 9165 does not automatically make the evidence inadmissible, especially if the integrity of the evidence is maintained and any lapse can be justified.

Historical Background:

The case is significant in the context of the Philippines' ongoing battle against illegal drugs, highlighting the judicial standards applied to buy-bust operations and the admissibility of evidence therein. It underscores the tension between rigorous procedural standards in drug-related arrests and practical challenges faced by law enforcement.