

### Title: People of the Philippines v. Chad Manansala y Lagman

### Facts:

Chad Manansala y Lagman was charged and convicted for the illegal possession and control of 750 grams of dried marijuana leaves violating Section 8 of Republic Act No. 6425 (Dangerous Drugs Act of 1972). The case stemmed from an incident on October 19, 1994, in Olongapo City, where police, after conducting a test-buy operation and securing a search warrant, discovered the prohibited drugs in Manansala's residence. Despite the initial charge being related to illegal selling, the Regional Trial Court (RTC) of Olongapo City convicted Manansala for illegal possession due to insufficient evidence on the sale but conclusive evidence on possession. This decision was made despite the initial information detailing an illegal sale. The Court of Appeals (CA) subsequently affirmed this decision with modification on July 26, 2006. Manansala appealed the decision to the Supreme Court, arguing primarily the violation of his constitutional right to be informed of the nature and cause of the accusation due to the discrepancy between the charge (illegal sale) and the conviction (illegal possession).

### Issues:

1. Whether the conviction for illegal possession instead of illegal sale violated Manansala's constitutional right to be informed of the nature and cause of the accusation against him.
2. Whether the crime of illegal possession of marijuana is necessarily included in the crime of illegal sale of marijuana.

### Court's Decision:

The Supreme Court affirmed the Court of Appeals' decision, holding that Manansala's conviction for illegal possession under the information originally alleging illegal sale did not violate his constitutional rights. The Court opined that the illegal sale of marijuana under Section 4 of Republic Act No. 6425 necessarily includes illegal possession because the act of selling implies prior possession. Furthermore, the Court highlighted that the information provided sufficient notice to Manansala that he was being accused of having control and possession of the prohibited drugs, hence not violating his right to be informed of the accusation. The Court maintained that given the facts established, including the legal procurement of the search warrant and the seizure of the drugs from his residence, the conviction for illegal possession was proper and supported by evidence.

### Doctrine:

The doctrine established in this case is two-fold. Firstly, an accused's constitutional right to be informed of the nature and cause of the accusation is not violated when the information sufficiently alleges facts constituting an offense that includes the offense proven during trial. Secondly, the illegal sale of prohibited drugs necessarily includes the crime of illegal possession thereof, especially when the sale implies prior possession and control of said drugs.

### Class Notes:

1. **\*\*Illegal Possession of Prohibited Drugs\*\***: Elements include (a) the accused is in possession of a prohibited drug, (b) such possession is not authorized by law, and (c) the accused freely and consciously possessed said drug.
2. **\*\*Illegal Sale of Prohibited Drugs\*\***: Elements involve (a) the accused sold and delivered a prohibited drug to another, and (b) he knew that what he had sold and delivered was a dangerous drug.
3. **\*\*Inclusion of One Crime in Another\*\***: A charge for the illegal sale of prohibited drugs necessarily includes the illegal possession of the same, as possession is implied in the act of selling.

### Historical Background:

This case underscores the judiciary's interpretative stance on the legal nexus between possession and sale of prohibited drugs under Philippine law, amidst challenging the boundaries of constitutional rights. It illustrates the procedural intricacies and judicial discretion involved in cases where the nature of the offense evolves from the charge to conviction, reaffirming the principle of legality in the interpretation of penal statutes and the accused's rights.