

### Title:

\*\*People of the Philippines vs. Mercelita Arenas y Bonzo\*\*

### Facts:

- Date & Location: August 6, 2010, Brgy. Poblacion, Sual, Pangasinan.
- Accused: Mercelita Arenas y Bonzo, charged for violating Sections 5 and 11 of Republic Act No. 9165 (Comprehensive Dangerous Drugs Act of 2002) for unlawfully selling and possessing Methamphetamine Hydrochloride (Shabu).
- The accused was arrested after a buy-bust operation where she allegedly sold Shabu to an undercover police officer, PO3 Benedict Julius B. Rimando.
- PO3 Rimando acted as a poseur-buyer, while the other team members were positioned strategically. Arenas sold two heat-sealed plastic sachets of Shabu to Rimando in exchange for P2,000.00 marked money. Additionally, another sachet was recovered from her possession.
- The seized items were marked, documented, and submitted for examination confirming the presence of Methamphetamine Hydrochloride.
- Arenas claimed frame-up and denied the charges, providing an alibi that involved interactions with a certain "Mina" and being inadvertently involved in police operations due to mistaken identity.
- The Regional Trial Court (RTC) found Arenas guilty, a decision which the Court of Appeals upheld. The Supreme Court affirmed the conviction with modifications regarding the penalty for possession.

### Issues:

1. The validity of the buy-bust operation and adherence to legal procedures.
2. The credibility of the witnesses and the accused's defenses.
3. Correct application of laws regarding illegal drug possession and sale.
4. Proper conduct and documentation of chain of custody.
5. Admissibility and sufficiency of prosecution evidence to establish guilt beyond reasonable doubt.

### Court's Decision:

- The Supreme Court dismissed the appeal, affirming the convictions for both selling and possessing Shabu. The decision elaborated on the elements necessary for a valid buy-bust operation and found them present in this case.
- On the issue of chain of custody, the Court determined that the procedural requirements were satisfactorily met.

- The inconsistencies highlighted by the defense were deemed minor and unrelated to the core facts of the crimes.
- The Court recalibrated the penalty for possession due to inadequate specification of quantity in the Information but reaffirmed the conviction based on established possession.

### Doctrine:

- This case reiterated the significance of establishing chain of custody in drug-related prosecutions to maintain the integrity of the seized evidence from the moment of capture to courtroom presentation.
- It also underscored the necessity for each element of illegal sale and possession of dangerous drugs to be established beyond reasonable doubt for conviction under RA 9165.

### Class Notes:

- Elements of Illegal Sale of Drugs: Identity of buyer and seller, object and consideration of sale, and delivery and payment for the item sold.
- Elements of Illegal Possession of Drugs: Proof of possession, lack of legal authority to possess, and aware possession of the illegal drug.
- Key Legal Statutes: Republic Act No. 9165 (Sections 5 and 11), Dangerous Drugs Board Regulation No. 1, Series of 2002 (definition of chain of custody).

### Historical Background:

This case reflects ongoing efforts within the Philippine legal system to combat the illicit drug trade. The enforcement of RA 9165 and the conduct of buy-bust operations are part of broader strategies to address drug-related crimes in the country. This decision further emphasizes the judiciary's stance on upholding stringent standards for evidence handling and procedural correctness in drug cases, critical for ensuring justice and fairness in the legal process.