

Title:

Eduardo Quintero vs. The National Bureau of Investigation, et al.

Facts:

The chain of events leading to the Supreme Court case began on May 19, 1972, when Eduardo Quintero, a delegate to the 1971 Philippine Constitutional Convention, disclosed in a privilege speech that bribes had been given to delegates, aimed at influencing their decisions. Subsequently, pressured to name those behind the bribes, Quintero identified several individuals, including the then First Lady, Imelda Marcos, in a sworn statement.

This explosive revelation led to President Ferdinand Marcos vowing to unmask and prosecute Quintero. On May 31, 1972, based on an application by the National Bureau of Investigation (NBI) and affidavits, particularly from Congressman Artemio Mate, who alleged without firsthand knowledge that Quintero received a bribe, a search warrant was issued by Judge Elias Asuncion. That night, NBI agents raided Quintero's home and claimed to have discovered large sums of money.

Quintero responded by filing a petition challenging the validity of the search warrant and the proceedings based on it. The Supreme Court issued a temporary restraining order against the use of items seized during the raid on June 6, 1972.

Issues:

1. Whether the issuance of Search Warrant No. 7 was constitutional and complied with the requirements for probable cause.
2. The legality and procedural correctness of the search conducted under the said warrant.
3. The admissibility of the items reportedly seized during the raid.

Court's Decision:

The Supreme Court found that Search Warrant No. 7 and the actions taken under it were unconstitutional and void for several reasons. Firstly, it was determined that there was no probable cause for the issuance of the warrant, as the evidence presented was either hearsay or lacked sufficient specificity. Secondly, the search conducted was deemed irregular, as it violated procedural requirements, such as conducting the search in the presence of witnesses and providing a detailed receipt for seized items. Consequently, the Court declared the search warrant null and void, making all evidence obtained through it inadmissible.

Doctrine:

This case reinforces the strict requirements for the issuance of search warrants and the conduct of searches, emphasizing the constitutional protection against unreasonable searches and seizures. It underscores the necessity for probable cause to be determined personally by a judge based on specific facts rather than conjecture or hearsay.

Class Notes:

1. **Probable Cause:** Facts and circumstances that would lead a reasonable, prudent person to believe a crime has been committed and that the evidence of the crime is at the place to be searched.
2. **Unreasonable Search and Seizure:** Any search and seizure by a governmental entity or representative that violates the protected rights found in the Constitution's provisions.
3. **Witness Requirement in Searches:** Searches must be conducted in the presence of the occupant of the premises being searched or at least two witnesses of sufficient age and discretion residing in the same locality.
4. **Receipt for Seized Property:** A detailed receipt must be given to the person from whose possession the property was taken, or in their absence, left in the place where the property was found.

Historical Background:

The case took place against the backdrop of a tense political climate leading up to the declaration of Martial Law in the Philippines in September 1972. It reflects the use of judicial and administrative powers to suppress political opposition and the importance of judicial safeguards to protect constitutional rights amidst political turmoil.