

Title: People of the Philippines vs. Romy Lim y Miranda

Facts:

On October 19, 2010, at approximately 10:00 p.m., a buy-bust operation was conducted in Cagayan de Oro City, Philippines, targeting Romy Lim y Miranda (Lim) and his stepson, Eldie Gorres y Nave (Gorres), for their alleged engagement in the sale of prohibited drugs. The operation was triggered by a confidential informant's report to the Philippine Drug Enforcement Agency (PDEA). Lim was charged with illegal possession and sale of Methamphetamine Hydrochloride (shabu), violative of Sections 11 and 5, respectively, of Article II of Republic Act (R.A.) No. 9165, the Comprehensive Dangerous Drugs Act of 2002.

The prosecution presented testimony from PDEA officers, illustrating how the buy-bust operation was plotted and executed. The defense, alternatively, depicted an unlawful intrusion and arrest, asserting innocence and the framing-up by authorities.

The Regional Trial Court (RTC) convicted Lim for both charges, a decision affirmed by the Court of Appeals (CA). At the Supreme Court (SC), Lim appealed for acquittal, emphasizing procedural lapses in the handling and custody of the seized drugs, which he argued compromised the integrity of the evidence against him.

Issues:

1. Whether the procedures mandated by R.A. No. 9165, specifically Section 21 regarding the custody and control of confiscated drugs, were complied with.
2. Whether the failure to strictly comply with Section 21 procedures affects the integrity and evidentiary value of the seized drugs.

Court's Decision:

The SC reversed the CA and RTC's decisions, acquitting Lim. The Court emphasized the importance of the chain of custody rule, establishing the sequence of custody of the seized drugs to ensure their integrity and evidentiary value. It found significant deviations from the procedures mandated by Section 21, notably:

- The absence of an elected public official, a Department of Justice (DOJ) representative, and a media witness during the inventory and photography of the seized items.
- The failure of the prosecution to provide justifiable grounds for these lapses.

As these deviations were not sufficiently justified and potentially compromised the evidence's integrity, the SC concluded that Lim should be acquitted based on reasonable doubt.

Doctrine:

Strict adherence to the chain of custody rule is crucial in prosecutions involving illegal drugs. Non-compliance with the prescribed procedures, particularly the requirements for inventory and photographing of seized items in the presence of statutory witnesses under Section 21 of R.A. No. 9165, can undermine the integrity and evidentiary value of the drugs, leading to acquittal unless justifiable grounds are presented and the integrity of the evidence is proven to be preserved.

Class Notes:

- The chain of custody rule establishes the continuity of possession of seized illegal drugs, ensuring their integrity from seizure to court presentation.
- Requirements under Section 21(1) of R.A. No. 9165 include immediate inventory and photographing of seized items in the presence of the accused or representative/counsel, a media representative, a DOJ representative, and an elected public official.
- Non-compliance with Section 21(1) must be justifiably explained, focusing on efforts to preserve the integrity and evidentiary value of the seized items.

Historical Background:

This case underscores the tension between effective law enforcement in drug-related crimes and adherence to procedural safeguards designed to maintain the integrity of evidence and protect the rights of the accused. It reflects the judiciary's role in scrutinizing law enforcement practices against constitutional and statutory protections, emphasizing the balance between public interest in crime prevention and individual rights.