

### Title: People of the Philippines vs. Fati Omogbolahan Alabi, Yamba Lisasi Bhola, and Zariatu Amidu

### Facts:

On March 31, 1993, in Manila, the accused, including a Thai national Suchinda Leangsiri (at large), were charged with conspiring in the transport and delivery of 8,225.31 grams of heroin, a prohibited drug, violating Section 4, Article II, of Republic Act (R.A.) No. 6425. Upon Leangsiri's arrest at the Ninoy Aquino International Airport (NAIA) and his revelation about delivering the contraband to three people at the Las Palmas Hotel, a follow-up operation led by Major Albino Sablayan and Sr. Insp. Adolfo Samala ensued. The operation successfully captured appellants Alabi, Bhola, and Amidu at the hotel, with evidence including their possession and examination of the heroin. Despite their denial and claim of a different series of events leading to their arrest, the trial court, on August 31, 1993, found them guilty, resulting in life imprisonment and a fine. Subsequent motions for a new trial based on alleged errors and new evidence (testimony from Julita Thach Camerino) were denied by the trial court.

### Issues:

1. Whether the lower court erred in considering the existence of conspiracy among the accused.
2. Whether the prosecution failed to introduce sufficient evidence to prove the guilt of the accused beyond reasonable doubt.
3. Whether the court erred in disregarding credible defense evidence.
4. The validity of denying the accused's motion for a new trial based on the discovery of new evidence.

### Court's Decision:

1. The Supreme Court affirmed the trial court's decision, confirming the existence of conspiracy among appellants and Leangsiri, evidenced by their coordinated actions.
2. It ruled that the prosecution provided sufficient circumstantial evidence proving the accused's guilt beyond reasonable doubt.
3. Discrepancies in testimonies were deemed immaterial, not affecting the credibility or outcome related to the material facts proving the crime.
4. Denied the motion for a new trial, finding the new evidence (Camerino's testimony) insufficient to warrant a reconsideration of the original judgment.

### Doctrine:

Conspiracy need not be proved by direct evidence and may be inferred from the conduct of the accused before, during, and after the commission of the crime. The act of one conspirator is attributable to all.

### Class Notes:

- Conspiracy: Agreement and decision by two or more persons to commit a crime.
- Circumstantial Evidence: Can be sufficient to convict if it shows a consistent and coherent narrative pointing to the guilt of the accused beyond reasonable doubt.
- Motion for New Trial: Highly contingent on showing new evidence that could not have been discovered with reasonable diligence before or during the trial and would likely alter the judgment.
- The existence of “conspiracy” can be proven through the actions and coordination between parties involved, emphasizing the principle that the act of one is essentially the act of all conspirators.

### Historical Background:

The case illustrates the Philippine judicial system’s handling of drug trafficking offenses under R.A. No. 6425, emphasizing the strict enforcement against and the severe penalties for violations of narcotics laws. It also reflects the challenges of pursuing justice in cases involving international drug syndicates and the reliance on circumstantial evidence to prove conspiracy and other elements of drug trafficking crimes.