

Title:

****People of the Philippines vs. Jesus Mirantes: A Case of Reasonable Doubt in Drug-Related Offenses****

Facts:

Jesus Mirantes was indicted under Republic Act No. 6425 (the Dangerous Drugs Act of 1972) for the alleged sale, transport, and delivery of two marijuana cigarettes in Iligan City on September 13, 1988. The charge also mentioned Guarberto Balolong as a conspirator, though his whereabouts remained unknown, and he was not apprehended. Mirantes pleaded not guilty.

The prosecution's case centered on a buy-bust operation conducted by the Narcotics Command (NARCOM) agents, including the alleged co-conspirator Balolong and the poseur-buyer Celso Engkig. Mirantes was arrested, and two alleged marijuana cigarettes were seized, which later tested positive for marijuana.

Mirantes's defense narrated a different story. He claimed to be catching bats at the time of the alleged buy-bust operation and denied any involvement in the drug transaction. His testimony was corroborated by a neighbor. Despite inconsistencies in the prosecution's evidence, the trial court found Mirantes guilty, sentencing him to reclusion perpetua and imposing a fine of P20,000.00. Mirantes appealed to the Supreme Court, challenging the credibility of the prosecution witnesses and the admissibility of the seizure receipt he was made to sign without counsel.

Issues:

1. Whether the trial court erred in giving credence to the prosecution's testimonies despite substantial inconsistencies.
2. Whether the seizure receipt signed by Mirantes without the assistance of counsel during custodial investigation was admissible.
3. Whether Mirantes's conviction was sustainable amidst significant reasonable doubts regarding his guilt.

Court's Decision:

The Supreme Court thoroughly examined each issue raised by Mirantes:

1. ****Credibility of Prosecution Witnesses****: The Court noted substantial inconsistencies in the prosecution's testimonies, especially regarding the composition of the buy-bust team and the sequence of events. The testimonies differed on critical aspects, and the mention of

co-accused Balolong as part of the buy-bust team without further explanation cast serious doubts on the prosecution's case.

2. **Admissibility of the Seizure Receipt**: The Court ruled the seizure receipt inadmissible, as it was signed by Mirantes without counsel during custodial investigation, violating his constitutional rights. This seizure receipt could not serve as the basis for conviction.

3. **Conviction Amidst Reasonable Doubt**: Given the inconsistencies and unexplained contradictions in the prosecution's evidence, the Court found that the evidence presented did not overcome the presumption of innocence in favor of Mirantes. The irregularities and the improbability of the prosecution's narrative rendered their evidence insufficient to sustain a conviction beyond reasonable doubt.

The Supreme Court reversed the trial court's decision and acquitted Jesus Mirantes on the ground of reasonable doubt.

Doctrine:

This case reiterates the principle that in criminal cases, the guilt of the accused must be proven beyond reasonable doubt. Where there are substantial inconsistencies in the testimonies of key prosecution witnesses, and significant procedural irregularities, such as violations of constitutional rights during custodial investigation, the accused must be acquitted.

Class Notes:

1. **Presumption of Innocence**: Every accused is presumed innocent until proven guilty beyond reasonable doubt. This case underscores the need for the prosecution's evidence to be watertight and free from significant contradictions.

2. **Right to Counsel During Custodial Investigation**: An accused must be assisted by counsel during custodial investigations, and any evidence obtained in violation of this right is inadmissible.

3. **Strength of Prosecution's Evidence**: The prosecution must rely on the strength of its evidence rather than the weaknesses of the defense's case. Discrepancies and inconsistencies in the prosecution's presentation can lead to acquittal.

Historical Background:

While this case adds to the jurisprudence on drug-related offenses and the conduct of buy-bust operations, it also highlights the pitfalls of poor investigative and prosecutorial practices. It underscores the necessity of strict adherence to procedural safeguards to

ensure that the rights of the accused are protected amidst the state's efforts to curb illegal drug activities.