

### Title: People of the Philippines vs. Leonardo Yanson, Jaime Sison, and Rosalie Bautista

### Facts:

On May 31, 1996, a silver gray Isuzu pickup with three occupants was stopped and searched at a checkpoint in M'lang, North Cotabato, following an uncorroborated tip about marijuana transportation from Pikit. The search, led by police officers without a warrant, resulted in the discovery of two sacks of marijuana next to the vehicle's engine. The individuals in the vehicle, identified as Jaime Sison, Leonardo Yanson, and Rosalie Bautista, were arrested and subsequently charged with a violation of Section 4 of Republic Act No. 6425, as amended, or the Dangerous Drugs Act of 1972.

At trial, the prosecution presented six witnesses, including police officers and a superintendent from the Davao City Crime Laboratory, which confirmed the seized substance as marijuana. In defense, the accused testified about their innocence and lack of knowledge regarding the marijuana found. The Regional Trial Court of Kabacan, Cotabato City, found all three accused guilty, sentencing them to life imprisonment and a fine, emphasizing the invalid warrantless search due to assumed consent and highlighted inconsistencies in the accused's testimonies.

This decision was appealed, but the Court of Appeals affirmed the ruling, maintaining the validity of the search and the existence of probable cause based on the tip received. Leonardo Yanson further appealed to the Supreme Court, arguing issues around the validity of the search and seizure, the application of RA 9165, and conspiracy among the accused.

### Issues:

1. Was the warrantless search of the pickup valid?
2. Can Section 21 of Republic Act No. 9165 be retroactively applied?
3. Did Leonardo Yanson act in conspiracy with his co-accused?

### Court's Decision:

The Supreme Court reversed the decision of the Court of Appeals, acquitting all accused. It ruled that the warrantless search, based solely on an uncorroborated tip, did not constitute probable cause. The Supreme Court determined that consent to the search was not voluntary but coerced, rendering the seized drugs inadmissible as evidence. The decision also addressed that with the primary evidence of drugs being inadmissible, proving the corpus delicti of the crime was impossible, further necessitating acquittal. Lastly, it held that an acquittal from an appeal benefits co-accused who did not appeal when the appellate

court's decision is favorable to them.

### Doctrine:

- The necessity of probable cause for a valid warrantless search and the inadmissibility of evidence obtained through an invalid search.
- Consent obtained under coercive circumstances is not genuine consent validating a warrantless search.
- The acquittal of an appealing accused extends to co-accused when favorable and applicable.

### Class Notes:

1. **Probable Cause for Warrantless Searches**: Evidence obtained via warrantless searches is only admissible if based on a valid probable cause.
2. **Coerced Consent is Invalid**: Consent given under intimidation or coercion by law enforcement does not legitimize a warrantless search.
3. **Corpus Delicti**: The body or essence of the offense. In drug cases, the seized drugs constitute the corpus delicti, crucial for proving the commission of the crime.
4. **Benefit of Acquittal in Appeals**: An acquittal in an appeal that benefits the appealing accused can extend to non-appealing co-accused under specific conditions.

### Historical Background:

The case exemplifies the critical balance between law enforcement's duty to prevent and penalize drug trafficking and the constitutional rights against unreasonable searches and seizures. This decision underscores the importance of adhering to constitutional safeguards to maintain justice and public trust in legal proceedings amid efforts to combat drug-related offenses in the Philippines.