

Title:

****People of the Philippines v. Raymond Buesa y Alibudbud: A Case of Illegal Sale and Possession of Dangerous Drugs****

Facts:

Raymond Buesa was charged with illegal sale and possession of Methamphetamine Hydrochloride (shabu) in Bay, Laguna, based on two separate Informations. Following his plea of not guilty, a trial ensued, primarily featuring the testimony of Police Officer 2 Jessie Abad. The prosecution outlined the buy-bust operation on April 25, 2016, detailing pre-operation coordination, execution, and subsequent marking and inventory of seized substances, which tested positive for shabu. Buesa, contrarily, claimed mistreatment and coercion by armed police officers, insisting on his innocence and lack of awareness regarding the charges at the time of arrest. The Regional Trial Court (RTC) found Buesa guilty, a decision later affirmed by the Court of Appeals (CA).

Issues:

1. Whether the prosecution established Buesa's guilt beyond reasonable doubt for the illegal sale and possession of shabu.
2. Whether the buy-bust operation and subsequent procedural requisites regarding the chain of custody were complied with, in accordance with R.A. No. 9165.
3. Whether the testimonial inconsistencies and alleged procedural lapses raised by Buesa merit his acquittal.

Court's Decision:

The Supreme Court dismissed Buesa's appeal, affirming the RTC's conviction. The Court found the illegal sale and possession adequately demonstrated, discrediting Buesa's claim of procedural non-compliance in the conduct of the inventory. The Court underscored the unbroken chain of custody from the moment of seizure to court presentation, satisfying the requirements for establishing the corpus delicti in drug-related offenses. Notably, the Court ruled that the presence of a media representative during the inventory suffices under R.A. No. 10640, dismissing the necessity of a National Prosecution Service representative. Buesa's defenses of denial and frame-up were considered standard and unconvincing without substantial evidence.

Doctrine:

The Supreme Court reiterated the importance of establishing an unbroken chain of custody in drug-related offenses to ensure the integrity of the seized substances. Additionally,

procedural requirements under R.A. No. 9165, as amended by R.A. No. 10640, particularly regarding the conduct of inventory and photographing of seized drugs, are deemed complied with in the presence of an elected official and either a media or National Prosecution Service representative, underlining a flexible interpretation guided by the law's objectives.

Class Notes:

- ****Chain of Custody in Drug Cases****: Essential in establishing the integrity of the evidence. Requires demonstration from seizure, marking, inventory, to courtroom presentation.
- ****Section 5 and 11, R.A. 9165****: Illegal sale and possession of dangerous drugs require proof of the transaction, the voluntariness of possession, and the unauthorized nature of such possession.
- ****Procedural Compliance under R.A. No. 9165****: Highlights the mandatory inventory in the presence of specific witnesses to safeguard against evidence tampering, with flexibility under justifiable grounds as per R.A. No. 10640.
- ****Defense in Drug Cases****: Denial and frame-up claims must be substantiated with strong evidence to overcome the presumption of regularity in the performance of official duties.

Historical Background:

This case exemplifies the judicial system's approach to drug-related offenses in the Philippines, particularly the stringent requirements for procedural compliance in buy-bust operations under R.A. No. 9165, as amended. It underscores the evolving jurisprudence acknowledging the challenges and realities law enforcement faces, allowing for a degree of procedural flexibility to ensure justice while maintaining the integrity of drug evidence.