

### ### Title

People of the Philippines vs. Shager Lacdan y Parto

### ### Facts

Shager P. Lacdan was charged for violation of Section 5, Article II of RA 9165 for selling 0.04 grams of methamphetamine hydrochloride or “shabu” to PO2 Alexander Gallega during a buy-bust operation on March 2, 2013, in San Pedro, Laguna. Lacdan pleaded not guilty. The prosecution presented PO2 Gallega, PO2 Vergara, and Forensic Chemist Donna Villa Huelgas as witnesses. Lacdan alone testified for the defense, denying involvement and alleging unlawful arrest. The trial court found Lacdan guilty, sentencing him to life imprisonment and a fine of P500,000.00. Lacdan appealed to the Court of Appeals, which affirmed the conviction.

### ### Issues

1. Whether the chain of custody rule under Section 21 of RA 9165 was complied with in the seizure, handling, and identification of the seized drug.

### ### Court’s Decision

The Supreme Court reversed the Court of Appeals and acquitted Lacdan. It found multiple violations of the chain of custody rule, casting doubt on the identity and integrity of the corpus delicti. Specifically, lack of compliance was noted in several links of the chain of custody, including improper marking and inventory of the seized drugs, and failure to properly document and maintain custody of the drugs through each transfer.

### ### Doctrine

The case reiterated the importance of strict compliance with the chain of custody rule in illegal drug cases to ensure the integrity and identity of the seized drugs. It highlighted that in cases of non-compliance, without justifiable grounds, that affects the identity and evidentiary value of the seized drugs, it may warrant the acquittal of the accused.

### ### Class Notes

- **Chain of Custody Rule**: Essential for preserving the integrity of the evidence in illegal drug cases. Includes seizure, marking, inventory, and turnover of the seized drugs, with adherence to protocols at each step.
- **Section 21, RA 9165**: Specifies the procedure for custody and disposition of seized drugs, emphasized the importance of the presence of the accused or representatives during inventory, and underscores the requirement for a strict chain of custody.

- **\*\*Acquittal Due to Procedural Missteps\*\***: Demonstrates that failure to strictly follow procedural requirements, especially regarding the chain of custody, can lead to doubts about the integrity of the evidence, leading to acquittal.

### ### Historical Background

The importance of this case lies in the scrutiny of the procedural requirements under RA 9165, emphasizing the judiciary's role in ensuring that law enforcement adheres to the law's mandates to protect the rights of the accused, maintain the integrity of the judicial process, and ensure that convictions are based on reliable evidence. This case exemplifies the high standards set by Philippine law for drug-related offenses and the rigorous evaluation evidence must undergo in court.