

Title

People of the Philippines vs. Zaldy Sioson Y Limon

Facts

Two separate Information dated October 28, 2015, charged Zaldy Sioson y Limon (Sioson) with illegal sale and illegal possession of dangerous drugs under Sections 5 and 11, Article II of Republic Act (R.A.) No. 9165, respectively. The prosecution's narrative detailed a buy-bust operation conducted on October 27, 2015, in Barangay Sta. Rosa, Pilar, Bataan, where Sioson allegedly sold a sachet of shabu to an undercover officer for P500.00. Additional sachets were purportedly found in Sioson's possession upon his arrest. The confiscated sachets tested positive for Methamphetamine Hydrochloride or shabu.

Sioson, however, offered an alibi, claiming he was in Pampanga during the operation, and was assaulted and apprehended by police at a friend's house in Pilar, Bataan.

The Regional Trial Court (RTC) of Balanga City, Bataan, Branch 92, convicted Sioson on March 29, 2017. This decision was affirmed by the Court of Appeals (CA) in CA-G.R. CR-H.C. No. 09204 on May 16, 2018. Sioson appealed to the Supreme Court, questioning the handling and custody of the seized drugs.

Issues

1. Whether the prosecution satisfactorily established Sioson's guilt for the illegal sale and possession of dangerous drugs under R.A. No. 9165.
2. Whether the chain of custody rule under Section 21(1), Article II of R.A. No. 9165 was adequately complied with by the buy-bust team.

Court's Decision

The appeal was granted by the Supreme Court. It was ruled that:

- For the illegal sale of dangerous drugs, the transaction (including the identity of the buyer and seller, what and how much was sold, and evidence of the consummated sale) must be clearly demonstrated; similarly, the elements of illegal possession must be unequivocally satisfied.
- In drug-related offenses, the chain of custody over the seized item is pivotal since the object of the crime (the drugs) forms part of the crime's corpus delicti.
- In this case, the Supreme Court found discrepancies in the handling of the seized drugs, particularly in marking them and conducting inventory and photographing in the presence of required witnesses. No justification was provided for deviating from the mandated

procedures.

- These lapses introduced reasonable doubt about the integrity of the drug evidence and, consequently, Sioson's guilt.

The Court acquitted Sioson due to the prosecution's failure to preserve the drug evidence's integrity beyond reasonable doubt under the guidelines set by the law.

Doctrine

The integrity of the corpus delicti in drug cases is paramount, and strict compliance with the procedures for the chain of custody is determinative of the accused's guilt or innocence. Non-compliance, without justifiable reasons, warrants acquittal.

Class Notes

- **Corpus Delicti**: In illegal drug offenses, the confiscated drug is a primary element of the crime.
- **Chain of Custody Rule**: Requires that each link in the chain of custody from seizure to court must be preserved without reasonable doubt to ensure the drug's integrity.
- **Compliance with Section 21, R.A. No. 9165**: Its procedural safeguards are crucial in upholding a conviction in drug-related cases.
- **Justifiable Grounds for Deviation**: The prosecution must demonstrate any deviation from the prescribed procedures was for justifiable grounds to maintain the evidence's integrity.

Historical Background

This decision emphasizes the Supreme Court's stringent stance on adherence to procedural requirements in handling evidence in drug cases. It reflects the judiciary's role in safeguarding constitutional rights against procedural lapses that could compromise the fair trial rights of the accused.