

****Title:**** *People of the Philippines v. Teng Moner y Adam: A Scrutiny of Chain of Custody in Illegal Drug Sale Conviction*

****Facts:****

The case against Teng Moner y Adam (Moner) originated from his arrest on April 23, 2005, in Quezon City, Philippines, for the illegal sale of 3.91 grams of methylamphetamine hydrochloride, known locally as shabu. The arrest stemmed from a buy-bust operation conducted by the Las Piñas Police Station Anti-Illegal Drugs Special Operation Task Force (SAIDSOTF) upon receiving information from a previously arrested individual, Joel Taudil, identifying Moner as his drug source.

The operation was led by Police Chief Jonathan Cabal with a team comprising SPO4 Arnold Alabastro, SPO1 Warlie Hermo, PO3 Junnifer Tuldanes, PO3 Edwin Lirio, PO2 Rodel Ordinaryo, PO1 Erwin Sabbun, and PO2 Joachim Panopio, the latter acting as the poseur-buyer. Upon coordination with the Central Police District Office (CPDO), the team, accompanied by Taudil and CPD personnel, proceeded to Moner's residence. After a transaction was seemingly completed between Moner and Panopio, Moner was arrested, although he resisted. Other individuals present in the house were also apprehended with Moner accused of also violating Section 11, Article II (possession of dangerous drugs) under the same law.

Moner, pleading "Not Guilty" at arraignment, contended at trial through witnesses and his testimony that he and others were falsely arrested and implicated in the sale and possession of illegal drugs due to planted evidence. Despite his defense, the Regional Trial Court (RTC) of Quezon City convicted him of the illegal sale of dangerous drugs but acquitted him and his co-accused of possession. The Court of Appeals affirmed this decision, leading Moner to elevate his appeal to the Supreme Court.

****Issues:****

1. Whether the prosecution established the guilt of the accused-appellant beyond a reasonable doubt for the illegal sale of dangerous drugs.
2. Whether the lapse in strictly adhering to the chain of custody rule over the seized drugs warranted acquittal.

****Court's Decision:****

The Supreme Court dismissed Moner's appeal, upholding his conviction. The Court held that the essential elements for illegal sale were sufficiently demonstrated: the transaction,

presentation of the corpus delicti, and proper identification of the buyer and seller. Moreover, the failure to strictly follow the chain of custody protocol did not automatically render the seized drugs inadmissible, as there was reasonable assurance of their integrity and evidentiary value. The Court iterated that deviations from procedure could be excusable provided there were justifiable grounds and the integrity and evidentiary value of the seized items were preserved.

****Doctrine:****

The Supreme Court reasserted the principle that non-compliance with Section 21 of Republic Act No. 9165 concerning the chain of custody of seized drugs does not automatically invalidate the seizures if it can be shown that despite the procedural lapses, the integrity and evidentiary value of the drugs have been preserved.

****Class Notes:****

- The conviction for illegal sale of dangerous drugs hinges on establishing the transaction, the presentation of the drug as evidence, and identification of the parties involved.
- The chain of custody is crucial in preserving the integrity of drug-related evidence; however, perfect compliance is not indispensable to a successful prosecution provided the integrity and evidentiary value of the seized items were not compromised.
- The credibility of police officers as witnesses is generally presumed, and inconsistencies in their testimonies that do not go to the heart of their narratives are considered minor and do not detract from their overall reliability.

****Historical Background:****

The legislative framework addressing the sale, possession, and distribution of illegal drugs in the Philippines underscores the government's intent to staunch the proliferation of drug abuse and trafficking within the country. Enacted laws have evolved to facilitate the prosecution of drug-related offenses while attempting to balance the imperative of procedural safeguards to ensure fairness and justice in the legal process. This case exemplifies the judiciary's interpretation of such laws, particularly the contentious aspects of procedural requirements vis-à-vis the practical realities of conducting anti-drug operations.