

Title: PEOPLE OF THE PHILIPPINES vs. JESUS GARCIA y MANABAT

Facts:

On November 28, 1994, in Baguio City, Philippines, Jesus Garcia y Manabat was observed by Senior Inspector Oliver Enmodias and SPO3 Jose Panganiban to be in possession of a plastic bag suspected to contain marijuana as they shared a jeepney ride. Acting on their suspicion, after Garcia alighted at Baguio City Hall and proceeded to Rizal Park, they followed him. There, they witnessed Garcia transferring what appeared to be marijuana from the plastic bag to a green traveling bag. After confirming the suspect's engagement with marijuana, the police arrested Garcia and seized the marijuana bricks, totaling five kilos upon chemical verification.

Contrary to Garcia's narrative, he denied possessing marijuana or any bag that day, claiming a visit to his brother was his sole purpose. However, his allegations were contradicted by procedural acts of the arrest and evidence presented by the prosecution, including the bricks of marijuana verified through chemical analysis.

The initial sentence of death as per RTC Judge Pastor de Guzman, Jr.'s decision on January 29, 1996, was appealed. Issues regarding the promulgation post-Judge de Guzman's retirement and the credibility of witness testimonies were raised.

Issues:

1. Whether the decision convicting Garcia was valid despite being promulgated after the retirement of the presiding judge.
2. Whether the uncorroborated testimony of Inspector Enmodias, alongside procedural discrepancies in the arrest and investigation process, sufficed to establish Garcia's guilt beyond reasonable doubt.

Court's Decision:

The Supreme Court affirmed Garcia's conviction with modification. It clarified that Judge de Guzman was de facto in office during the decision's promulgation, hence retaining its validity. It further held that the singular, uncorroborated testimony of Senior Inspector Enmodias was credible and sufficient to establish Garcia's guilt beyond reasonable doubt. Thus, Garcia's contention about the irregularity of his arrest and detention was dismissed, noting that law enforcement officers acted within reasonable and lawful bounds. The

original penalty of death was modified to reclusion perpetua with the additional imposition of a P10,000,000 fine due to absence of any aggravating circumstance.

Doctrine:

1. **De Facto Officers**: A decision made by a judge who is a de facto officer in actual exercise of office at the time of promulgation is valid and binding.
2. **Credibility of Witnesses**: The credibility of a single, though uncorroborated, witness can be sufficient to support a conviction if the testimony is coherent, natural, plausible, and corroborated by the circumstances or physical evidence.
3. **Lawful Arrest Without Warrant**: Police officers having personal knowledge of facts indicating that the person to be arrested has committed a crime can lawfully arrest the person without a warrant.

Class Notes:

- **De facto vs. De jure Officers**: De facto officers are those who hold office with a color of right but may have a flaw in their appointment, whereas de jure officers have a clear and undisputed right to office.
- **Testimony Strength**: The courts often rely on the quality rather than the quantity of testimony. A single witness's credible account can lead to conviction, emphasizing the importance of witness credibility and consistency.
- **Lawful Arrest Criteria**: For a warrantless arrest to be deemed lawful, the arresting officer must have direct knowledge or was an eyewitness to the crime committed, aligning with Rule 113, Section 5 of the Rules on Criminal Procedure.

Historical Background:

The case underscores the Philippine justice system's response to illegal possession and distribution of prohibited drugs, reflective of the country's stringent laws on narcotics as stipulated in R.A. 6425, as amended by R.A. 7659. It also highlights procedural nuances and judicial principles concerning arrest without warrant, the credibility of law enforcement officers as witnesses, and the legal impact of decisions made by de facto judicial officers.