

Title: People of the Philippines vs. Leng Haiyun, Dang Huiyin, Liu Wen Xion a.k.a. “Lui Xin,” and Lei Guang Feng

Facts:

On May 28, 2013, in Pasuquin, Ilocos Norte, a gasoline station attendant reported to the police about suspicious behavior involving a silver gray Toyota Previa. The accused, identified as Leng Haiyun, Dang Huiyin, Liu Wen Xion a.k.a. “Lui Xin,” and Lei Guang Feng, attempted to flee upon the arrival of the police but were apprehended at a COMELEC checkpoint. The police conducted a search without a warrant, revealing illegal firearms and explosives within the vehicle. The Regional Trial Court (RTC) and the Court of Appeals (CA) found the accused guilty of illegal possession of explosives and violation of the Omnibus Election Code, specifically the COMELEC gun ban.

Issues:

1. Whether the warrantless arrest and subsequent search and seizure conducted by the police officers were valid.
2. Whether the accused were properly convicted of illegal possession of explosives and violation of the COMELEC gun ban.
3. Whether the collected evidence is admissible, considering the legality of the search and seizure.

Court’s Decision:

The Supreme Court affirmed the CA’s decision, holding that:

1. The warrantless arrest was valid under Section 5(b) Rule 113 of the Rules of Court, constituting a “hot pursuit” arrest based on the officers’ reasonable suspicion and the immediacy of their investigation.
2. The warrantless search of the vehicle was justified under the “plain view” doctrine, as the officers were lawfully positioned to observe the contraband inside the vehicle.
3. The evidence obtained from the lawful search and seizure was admissible, proving the guilt of the accused beyond reasonable doubt for illegal possession of explosives and violation of the Omnibus Election Code.

Doctrine:

- The “hot pursuit” arrest doctrine under Section 5(b) Rule 113 of the Rules of Court allows warrantless arrests based on probable cause and immediate investigation following the commission of an offense.
- The “plain view” doctrine permits the seizure of evidence without a warrant if it is

immediately apparent to the officer that the items are evidence of a crime or contraband.

Class Notes:

- **Hot Pursuit Arrest**: A valid warrantless arrest requires an immediate investigation and probable cause based on the officer's personal knowledge of the offense committed.
- **Plain View Doctrine**: For the doctrine to apply, the officer must lawfully be in the viewing area, the discovery of the evidence must be inadvertent, and it must be immediately apparent that the items are evidence of a crime.
- **Legal Searches Incident to Lawful Arrest**: A search can be conducted without a warrant if it's incident to a lawful arrest, covering areas within the immediate control of the arrested individual where evidence may be found.

Historical Background:

This case illustrates the application of doctrines allowing for warrantless arrests and searches, serving as an important precedent in understanding the balance between law enforcement objectives and constitutional rights in the Philippines. It emphasizes the courts' role in scrutinizing the legality of police actions during arrests and searches, reinforcing the protections against unreasonable searches and seizures under Philippine law.