

### Title: People of the Philippines vs. Antonio Correa y Cayton, et al.

### Facts:

This case journeyed through the judicial system beginning with the filing of an Information on July 12, 1994, at the Regional Trial Court of Manila. The accused, Antonio Correa, Rito Gunida, and Leonardo Dulay, were charged with violating Section 4, Article II of Republic Act No. 6425 as amended, for transporting 16.1789 kilograms of dried marijuana flowering tops without legal authorization.

On arraignment, the accused pleaded not guilty. The prosecution's primary evidence hinged on the testimony of SPO3 Jesus Faller, who was part of a police operation that led to the arrest of the appellants in the act of transporting the prohibited drug in the early hours of June 18, 1994.

The appellants contested their guilt, asserting wrongful arrest and presenting an alibi claiming they were apprehended in another city, which was their place of residence. The case escalated to the Supreme Court as the appellants challenged the lower court's handling, including the court's jurisdiction, admissibility of evidence, reliance on the lone testimony of SPO3 Faller, and the sufficiency of evidence for conviction.

### Issues:

1. **Jurisdiction and Legality of Arrest**: Whether the lower court erred in taking cognizance of the case based on the appellants' arrest location allegation.
2. **Admissibility of Seized Evidence**: Whether the evidence seized during a warrantless search conducted without any search warrant was admissible.
3. **Sole Testimony for Conviction**: Whether the conviction based solely on the uncorroborated testimony of a single police witness was proper.
4. **Sufficiency of Prosecution's Evidence**: Whether the prosecution's evidence was adequate to establish the guilt of the accused beyond a reasonable doubt.

### Court's Decision:

The Supreme Court acknowledged the lower court's rightful conviction of the appellants for the crime charged but found the imposition of the death penalty inappropriate under the law. The decision was based on a detailed analysis of the testimonies, evidence, and the procedural journey of the case.

1. **Jurisdiction and Legality of Arrest**: The Court determined that the arrest was lawful and the jurisdiction of the lower court proper. The appellants' arguments were deemed speculative, lacking in evidence.
2. **Admissibility of Seized Evidence**: The Supreme Court held that the accused effectively waived their objection to the seizure's legality by failing to protest during the operation and by entering a not guilty plea and participating in the trial.
3. **Sole Testimony for Conviction**: The Court ruled that the testimony of SPO3 Jesus Faller, being credible and positive, was sufficient for conviction, dismissing the need for corroborative testimony.
4. **Sufficiency of Prosecution's Evidence**: The Court affirmed the sufficiency of the prosecution's evidence, emphasizing the positive identification of the appellants caught in flagrante delicto transporting the prohibited drug.

### ### Doctrine:

The Supreme Court reiterated the doctrine that the testimony of a single, credible witness is sufficient to support a conviction. It also held that the voluntary submission to the jurisdiction of the court through participating in the trial without contesting the legality of the search and seizure effectively waives any objection to the admissibility of evidence obtained during the warrantless search.

### ### Class Notes:

1. **Legality of Arrest**: The legality of an arrest is determined by the presence of probable cause and the immediate circumstances leading to the apprehension.
2. **Admissibility of Evidence**: Evidence obtained from a warrantless search may be deemed admissible if the accused voluntarily submits to the jurisdiction of the court and participates in the trial.
3. **Sole Testimony for Conviction**: A conviction can be based on the solitary but credible and detailed testimony of a witness.
4. **Transporting Illegal Drugs**: Transporting illegal drugs, as a crime itself, does not necessitate the use of a motor vehicle as an aggravating circumstance since the act of transportation implies the use of a conveyance method.

### ### Historical Background:

The case drew significant attention to the legal and procedural aspects of the war against illegal drugs in the Philippines, highlighting the judiciary's challenges in balancing strict

enforcement with the protection of constitutional rights. It also underscored the critical role of law enforcement in the credible and lawful gathering of evidence.