

### Title: People of the Philippines v. Ng Yik Bun, et al.

### Facts:

The case stemmed from an incident on August 24, 2000, at Barangay Bignay II, Sariaya, Quezon, where the accused-appellants, Ng Yik Bun, Kwok Wai Cheng, Chang Chaun Shi, Chua Shilou Hwan, Kan Shun Min, and Raymond S. Tan, were indicted for the illegal transportation, delivery, and distribution of Methamphetamine Hydrochloride (shabu), violating Section 16, Article III of Republic Act No. 6425 (Dangerous Drugs Act of 1972). The accused were caught loading bags of shabu onto vehicles at Villa Vicenta Resort, prompting action from police officers who received intelligence about the shipment. Following surveillance, a team approached the accused, leading to their arrest without a warrant and the seizure of 364.057 kilos of shabu. The Regional Trial Court (RTC) of Quezon City, Branch 103, convicted the accused, sentencing them to reclusion perpetua and a fine. Their appeal to the Court of Appeals (CA) upheld the RTC's decision, leading to a further appeal to the Supreme Court (SC).

### Issues:

1. Whether the arrests of the accused-appellants were valid despite being warrantless.
2. Whether the subsequent search and seizure of the illegal drugs were valid.
3. Whether the trial court's procedural conduct, such as conducting a hearing outside the defendant's presence, was constitutional.
4. Whether the exhibit's admission and evidence of conspiracy among the accused-appellants were justifiable.

### Court's Decision:

1. The SC affirmed the CA's decision, corroborating the validity of the warrantless arrests under the principle of *in flagrante delicto*, as the accused were caught in the act of committing a crime.
2. The subsequent search and seizure were deemed valid under the plain view doctrine and due to the exigent circumstances that justified the lack of a search warrant.
3. The SC also found no violation of procedural rights regarding the absence of accused-appellant Hwan and his counsel during a court hearing, noting that he did not raise this issue timely and was thus deemed to have waived his rights.
4. The court upheld the ruling on the admissibility of evidence and the existence of a conspiracy among the accused, supporting their collective intention and action in committing the crime.

### Doctrine:

The SC reaffirmed the doctrines regarding the legality of warrantless arrests in instances of in flagrante delicto and justified warrantless searches and seizures under the plain view doctrine and exigent circumstances. It also stressed the importance of timely raising procedural concerns to prevent deemed waiver of rights.

### Class Notes:

- **Warrantless Arrest:** Valid when the person to be arrested has committed, is actually committing, or is attempting to commit an offense in the presence of the arresting officer.
- **Plain View Doctrine:** Objects falling in the plain view of an officer who has a right to be in the position to have that view are subject to seizure and may be presented as evidence.
- **Conspiracy:** The concerted action towards committing a crime can be inferred from the conduct of the accused indicating a common aim or purpose.
- **Timeliness in Raising Issues:** Procedural concerns must be timely raised, or they may be deemed waived.

### Historical Background:

This case illustrates the rigorous application of the Philippines' anti-drug laws and the judicial system's stance on warrantless arrests and searches in the context of narcotics enforcement. It shows how the courts balance the rigorous enforcement of drug prohibition with adherence to procedural rights and safeguards under the law.