

### Title: \*People of the Philippines v. Medel Tangliben y Bernardino\*

### Facts:

On March 2, 1982, in San Fernando, Pampanga, Medel Tangliben y Bernardino was apprehended by patrolmen while carrying a bag containing dried marijuana leaves, intending to transport them to Olongapo City without legal authorization. Following surveillance at the Victory Liner Terminal by Patrolmen Silverio Quevedo, Romeo L. Punzalan, and Barangay Tanod Macario Sacdalan aimed at drug traffickers, Tangliben, acting suspiciously with a red traveling bag, was confronted and found with marijuana upon inspection. Charged under Section 4, Article II of Republic Act 6425 (Dangerous Drugs Act of 1972), the Regional Trial Court at San Fernando, Pampanga, Branch 41, convicted Tangliben, sentencing him to life imprisonment, a fine of P20,000, and payment of costs. Tangliben's defense was primarily his alibi, stating he was actually in Subic at the time of the alleged crime, with the journey and proceedings detailed through the trial court and Supreme Court's appeals process.

### Issues:

1. \*Validity of Warrantless Arrest and Search\*: Whether the warrantless search and arrest of Tangliben were lawful under the exceptions to the requirement of a search warrant.
2. \*Admissibility of Seized Marijuana\*: Whether the seized marijuana was admissible as evidence despite the challenge on the grounds of improper authentication.
3. \*Sufficiency of Prosecution's Evidence\*: Whether the prosecution's evidence was sufficient to prove Tangliben's guilt beyond a reasonable doubt.

### Court's Decision:

1. **\*\*On Warrantless Arrest and Search\*\***: The Supreme Court affirmed the lawfulness of the warrantless arrest and search as exceptions to the requirement of a search warrant, citing that the arrest was incident to a lawful arrest for a crime committed in the presence of arresting officers.
2. **\*\*On Admissibility of Seized Marijuana\*\***: The Court ruled that the marijuana pack's admissibility was authenticated properly through the corroborative testimonies of the officers involved and the forensic chemist, satisfying the requirements of evidence authentication.
3. **\*\*On Sufficiency of Prosecution's Evidence\*\***: The Court found the prosecution's evidence sufficient to convict Tangliben. It held that the non-presentation of the informant was not

fatal to the prosecution's case and that the credibility granted to the officers' testimonies by the trial court merits high respect.

However, the Court modified the conviction from the offense of transporting to possession of marijuana, citing a lack of conclusive evidence for the intent to transport based on the quantity involved and the circumstances of the arrest. Thus, the life sentence was reduced to a range of six (6) years and one (1) day to twelve (12) years, with a fine of Six Thousand (P6,000.00) Pesos.

### ### Doctrine:

- **\*Warrantless Arrest and Search Incident to Lawful Arrest\***: A person lawfully arrested for a crime committed in the presence of arresting officers may be searched for dangerous weapons or proofs of the offense without a search warrant.
- **\*Authentication of Seized Evidence\***: The authentication of seized contraband can sufficiently be established through the testimony of officers involved in the seizure and corroboratory forensic analysis, even in the absence of physical identifiers linking the evidence directly to the defendant at every procedural step.
- **\*Sufficiency of Prosecution's Evidence with Absence of Informant's Testimony\***: The non-presentation of an informant, whose testimony would be corroborative, is not detrimental to the prosecution's case if the rest of the evidence, including officer testimonies, is credible and sufficient to support a conviction.

### ### Class Notes:

- **\*Warrantless Arrests\***: Valid when a crime is committed in the officer's presence; the element of immediacy and necessity justifies the exception.
- **\*Evidence Authentication\***: Demonstrated through direct association of the evidence with the crime, as established by chain of custody and forensic testimony.
- **\*Role of Informant Testimonies\***: Typically auxiliary; the credibility and sufficiency of the primary evidence are paramount.
- **\*Credibility of Officers' Testimonies\***: Given deference when acquired through the performance of official duties, absent evidence of ill motive.

### ### Historical Background:

This case emphasizes the stringent regulations under Republic Act 6425 concerning the possession and transport of dangerous drugs in the Philippines, reflecting the period's

robust stance against drug-related offenses. In modifying the conviction, the Supreme Court illustrated a nuanced approach towards evaluating the intent and actions related to drug possession and transport, distinguishing between mere possession and the intent to distribute.