

Title: **\*\*People of the Philippines vs. Carlito Linsangan y Diaz\*\***

Facts:

The case centers around Carlito Linsangan y Diaz, accused of selling ten hand-rolled sticks of marijuana cigarettes in Manila, Philippines, on November 13, 1987, a violation of the Dangerous Drugs Law, Republic Act 6425. Upon receiving information about rampant drug activities in Tondo, Manila, the Western Police District's Drug Enforcement Unit organized a buy-bust operation on November 13, 1987. During the operation, Patrolman Tomasito Corpuz, acting as a buyer, along with a confidential informant, approached Linsangan and purchased ten marijuana sticks with marked bills. After the transaction, Linsangan was apprehended, and the marked bills were retrieved from him at the police station. The marijuana was confirmed by the National Bureau of Investigation (NBI) through forensic examination. Despite Linsangan's defense of being in a vendor's stand at the time of the alleged buy-bust and suggestion that the police fabricated the charge due to a previous altercation, the trial court convicted him, sentencing him to reclusion perpetua and a fine of P20,000.

Issues:

1. Whether the testimonies of the prosecution witnesses, particularly Pfc. Ruiz and Corpuz, were credible despite alleged motives and inconsistencies.
2. Whether it was Linsangan or the informant who handed the marijuana sticks to Patrolman Corpuz.
3. Whether the marked money was planted evidence.
4. Whether requiring Linsangan to initial the P10-bills during custodial investigation without counsel violated his constitutional rights.

Court's Decision:

The Supreme Court dismissed the appeal for lack of merit, upholding the trial court's judgment. It found the prosecution witnesses credible, stating that minor inconsistencies did not detract from the overall credibility of the testimony regarding Linsangan's act of selling marijuana. The Court also dismissed the claim of planted evidence and concluded that Linsangan was not denied due process. Notably, the court adjusted the penalty from reclusion perpetua to life imprisonment and affirmed the imposed fine of P20,000.

Doctrine:

- Law enforcers are presumed to have performed their duties in a regular manner unless evidence proves otherwise.

- Possession of marked bills, absent counsel during initialing, does not violate constitutional rights when it does not constitute the crime itself but is merely evidentiary in proving engagement in illegal drug transactions.

Class Notes:

- Credibility of Witnesses: Minor inconsistencies that do not affect the substance of the testimony do not undermine the witness's credibility.
- Due Process in Custodial Investigation: The right against self-incrimination is not violated when a procedural action (e.g., initialing marked bills) does not constitute an admission of the crime for which an accused is being prosecuted.
- Presumption of Regularity: Law enforcement officers are presumed to have performed their duties in a regular and lawful manner unless there is clear evidence to the contrary.
- Legal Penalties: The Supreme Court has the authority to adjust sentences based on applicable laws and legal standards.

Historical Background:

This case illustrates the rigor and challenges in enforcing drug laws in the Philippines during the late 1980s, a period marked by active campaigns against illegal drugs. It underscores the legal processes involved in buy-bust operations, evidentiary standards for conviction in drug-related cases, and the balance between law enforcement procedures and constitutional rights.