

Title: Adoma v. People of the Philippines

Facts:

The case revolves around Jamel M. Adoma who was convicted of illegal possession of dangerous drugs. Troy Garma reported a robbery at his house and later tracked his stolen gadgets to Caesar Martin Pascua's place. Pascua indicated that Adoma brought the items to him. Police set up an entrapment operation at Pascua's house where Adoma was arrested. Upon searching him, police found two plastic sachets containing shabu. Adoma argued that the shabu was planted by the police. The RTC convicted Adoma, which was affirmed by the Court of Appeals.

Issues:

1. The validity of the warrantless arrest of Jamel M. Adoma.
2. Whether the prosecution established an unbroken chain of custody.

Court's Decision:

The Supreme Court ruled in favor of Adoma, setting aside the decision of the Court of Appeals and acquitting him. The Court found the hot pursuit arrest invalid as the officers had no personal knowledge of the crime based on their observation to satisfy the element of immediacy and personal knowledge required for a warrantless arrest. Further, the Supreme Court noted the failure to comply with the chain of custody rule, citing non-compliance in the immediate marking, inventory, and photograph of the seized drugs, as well as the lack of required witnesses during these processes.

Doctrine:

For a hot pursuit arrest to be valid, there must be personal knowledge by the arresting officers, based on their observation, of the immediate commission of the crime. The integrity and evidentiary value of seized items in drug-related cases are preserved through strict adherence to the chain of custody rule as outlined in Section 21 of Republic Act No. 9165.

Class Notes:

- Warrantless Arrest: Must meet the criteria of immediacy and personal knowledge by the officers of the crime's commission.
- Chain of Custody in Drug Cases: Requires immediate marking, inventory, and photograph of seized items in the presence of the accused and certain witnesses to preserve the integrity of the evidence.
- Validity of Evidence: Evidence obtained from an invalid arrest or through broken chain of

custody protocols may be deemed inadmissible.

Historical Background:

This case underscores the critical importance of following procedural rules in the arrest and handling of evidence in drug-related offenses. It highlights the balance the court seeks to maintain between ensuring public safety and safeguarding the constitutional rights of individuals against unlawful arrest and search, reflecting the judiciary's role in checking possible abuses in the enforcement of laws related to illegal drugs.