

**\*\*Title:\*\*** People of the Philippines vs. Oliver Renato Edaña y Ebdane

**\*\*Facts:\*\*** On August 6, 2002, an entrapment operation led by police officers and an informant was conducted to apprehend Oliver Renato Edaña and Godofredo Siochi for illegal drug transactions at a McDonald's parking area in West Avenue. Upon their arrival, the informant engaged Edaña in conversation within a vehicle. When police approached, Edaña attempted to flee but was captured after a short pursuit, with the officers recovering a plastic bag of shabu (methamphetamine) and a firearm from him. Siochi was also apprehended. Subsequent forensic examination confirmed the substance as shabu.

Noteworthy is the prosecution's account of the arrest and the immediate aftermath, contrasting sharply with Edaña's testimony. Edaña claimed he was meeting someone for a motorbike part and unexpectedly became ensnared in a violent arrest, suggesting mistreatment by police, including physical assault and threats.

Charged under Republic Act No. 9165 (The Comprehensive Dangerous Drugs Act of 2002), Edaña was convicted by the Regional Trial Court (RTC) in Quezon City and sentenced to life imprisonment; his conviction was affirmed by the Court of Appeals (CA). The procedural journey highlighted contentions over the warrantless arrest's validity, handling of the seized drugs, and adherence to procedural requirements for drug custody chain management.

**\*\*Issues:\*\*** The legal issues revolved around whether the warrantless arrest of Edaña was valid, if the seized shabu was admissible as evidence, and whether the prosecution established the guilt beyond reasonable doubt considering how the evidence was handled.

**\*\*Court's Decision:\*\*** The Supreme Court acquitted Edaña, declaring the warrantless arrest invalid due to the lack of an overt criminal act during police approach. The decision underlined the legal inconsistency with procedural requirements in the recovery, marking, inventory, and photographic documentation of seized drugs, casting doubt on the drugs' integrity and evidentiary value. Consequently, the procedural missteps led to the decision that the prosecution failed to prove Edaña's guilt beyond reasonable doubt.

**\*\*Doctrine:\*\*** The Supreme Court reiterated the doctrine that for a warrantless arrest to be valid, the person arrested must be performing an overt act indicating a crime at the moment of arrest. Additionally, the Court highlighted the paramount importance of directly adhering to the procedural safeguards outlined in the Comprehensive Dangerous Drugs Act (R.A. No. 9165) for evidence handling and custody to maintain the evidence's integrity and admissibility.

**\*\*Class Notes:\*\***

1. **\*\*Warrantless Arrest:\*\*** Valid if the person is committing, has committed, or is about to commit an offense in the presence of the arresting officer.
2. **\*\*Chain of Custody in Drug Cases:\*\*** Strict compliance with the handling, marking, inventory, and documentation of seized drugs is crucial to ensure the integrity and admissibility of evidence.
3. **\*\*Evidence Admissibility:\*\*** Evidence obtained from an invalid arrest or seizure is inadmissible, following the fruit of the poisonous tree doctrine.
4. **\*\*Procedural Requirements for Drug Custody:\*\*** Marking should be done immediately upon seizure by the apprehending officers, not by the accused, to secure the chain of custody.

**\*\*Historical Background:\*\*** This decision reflects the Supreme Court's steadfast commitment to enforcing procedural safeguards in drug-related offenses, emphasizing the importance of lawful arrest procedures and stringent evidence handling to protect the rights of the accused and the credibility of the judicial process.