

**\*\*Title:\*\*** People of the Philippines vs. Lita Ayangao y Batong-Og, G.R. No. 471 Phil. 379

**\*\*Facts:\*\***

On August 13, 1999, PO3 Bienvenido Sagum and PO3 Nestor Galvez, based on a tip received from an informant, conducted a surveillance operation for a woman allegedly trafficking marijuana in Mabalacat, Pampanga. The informant described the suspect as fitting the appearance of Lita Ayangao.

On the morning of August 13, the officers saw Ayangao arrive in Sapang Biabas with two sacks containing marijuana bricks, which were partially visible through a hole. They identified themselves, conducted a search, and discovered 15 bricks of marijuana weighing 14.75 kilos. Ayangao was arrested and the evidence was sent for examination at the PNP Crime Laboratory, confirming the presence of marijuana.

Ayangao contested the charges, claiming she was at a house in Mawaque, Mabalacat, visiting Jaime Alarcon upon request from a certain Magda Dumpao. She stated she was forcibly taken by police from Alarcon's house and framed with the marijuana. Reynaldo Nunag, a local tricycle driver, testified he did not witness any incident suggesting the arrest at the tricycle terminal.

The trial court found the prosecution's evidence credible over Ayangao's defense, convicting her for violating RA 7659, which amends the Dangerous Drugs Act by transporting illegal drugs.

**\*\*Procedural Posture:\*\***

1. Appellant filed a motion to quash, arguing the facts charged did not constitute an offense, which was denied.
2. She then entered a plea of not guilty and participated in the trial.
3. After trial, the Regional Trial Court found her guilty and imposed the penalty of reclusion perpetua and a fine of P500,000.
4. Appellant contested the trial court's decision by bringing the case on appeal to the Supreme Court, raising several errors including the credibility of witnesses, the sufficiency of evidence, and violation of her Miranda rights.

**\*\*Issues:\*\***

1. Whether the trial court erred in giving full faith and credence to the testimonies of the prosecution witnesses despite alleged inconsistencies.
2. Whether the trial court erred in not favoring the defense of alibi claimed by the appellant.

3. Whether the appellant's conviction should be overturned on grounds of reasonable doubt.
4. Whether the trial court erred in its failure to hold that the arrest violated the appellant's Miranda rights.

**\*\*Court's Decision:\*\***

1. **\*\*Credibility of Witnesses:\*\*** The Supreme Court upheld the trial court's assessment of the credibility of the witnesses, asserting that minor inconsistencies do not negate their testimonies. Observing the witnesses' demeanor and deportment on stand falls under the trial judge's purview.
2. **\*\*Defense of Alibi:\*\*** The Supreme Court found the appellant's alibi weak. Ayangao's location at Jaime Alarcon's house was merely 10 meters away from her arrest site, lacking the physical impossibility to be at the scene of the crime.
3. **\*\*Reasonable Doubt:\*\*** The Court affirmed the trial court's decision, concluded that the evidence presented established the appellant's guilt beyond reasonable doubt. The prosecution's evidence, including the testimonies of the arresting officers and the forensic chemist, were found reliable.
4. **\*\*Miranda Rights:\*\*** The Supreme Court noted that objections to arrest and search should be made before the plea; otherwise, they are deemed waived. Ayangao did not raise this before her plea and her active participation in the trial constituted a waiver.

**\*\*Doctrine:\*\***

1. **\*\*Warrantless Arrest:\*\*** The legitimate warrantless arrest authorized corresponding search and seizure. Rule 113, Section 5(a) of the Revised Rules of Criminal Procedure permits a warrantless arrest when an offense is committed in the presence of a peace officer.
2. **\*\*Probable Cause:\*\*** A tipped-off information, even received shortly before the arrest, can establish probable cause sufficient for a warrantless search and arrest.
3. **\*\*Waiver of Objections:\*\*** By entering a plea and participating in the trial without raising issues of arrest legality or Miranda rights violations, an accused waives those objections.

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

- **\*\*Regulated Search and Seizure:\*\*** Understand exigent and operational circumstances under which police can conduct searches without warrants.

- Relevant statute: Rule 113, Section 5(a), Revised Rules of Criminal Procedure.
- **Probable Cause:** Definition and application in real-time scenarios.
- **Alibi as a Defense:** Requirements - Accused must prove physical impossibility to be at the crime scene.
- **Miranda Rights:** Rights inculcation and waiver implications through participation in trial.

**Historical Background:**

The case illustrates the legal context in the Philippines where the war on drugs underpinned rigorous enforcement of the Dangerous Drugs Act (RA 6425). The systemic approach to combat drug trafficking highlights the operative procedures police follow underlined by judicial scrutiny, signifying evolving jurisprudence on constitutional safeguards against unreasonable searches and seizures while addressing the severity of the drug menace.