

****Title:**** People of the Philippines vs. Hadji Socor Cadidia

****Facts:****

On July 31, 2002, Marilyn Trayvilla, a Non-Uniformed Personnel at the Philippine National Police, was on duty as a frisker at Manila Domestic Airport Terminal I. Trayvilla, noticing something unusually thick around Cadidia's buttocks during a frisk, brought her to a restroom along with her colleague, Leilani Bagsican. In the restroom, upon removal of Cadidia's underwear, two sachets of shabu were discovered in her sanitary napkin. Cadidia claimed she was asked by an unidentified person to transport the shabu. The sachets were handed to their supervisor, SPO3 Musalli I. Appang.

Both Trayvilla and Bagsican testified to these events, corroborating each other's accounts. SPO3 Appang confirmed receiving the sachets and turning them over to the Regional Aviation Security Office. The seized items were then referred to Forensic Chemist Elisa G. Reyes for examination, who confirmed them to be methamphetamine hydrochloride, weighing 146.77 grams.

Custodial lapses noted included the absence of stenographic notes for Appang and Reyes, leading to a stipulation of their testimonies. Cadidia testified she was framed and denied possession of shabu, asserting that the police demanded Php200,000 from her relatives to avoid charges but were only able to offer Php6,000.

On August 12, 2002, Cadidia pleaded "not guilty." The trial court found Cadidia guilty and sentenced her to life imprisonment and a fine of Php500,000. The Court of Appeals affirmed the decision. Cadidia appealed to the Supreme Court, contesting procedural errors and claiming inconsistencies in testimonies and issues with the chain of custody of evidence.

****Issues:****

1. Did the trial court err in finding Cadidia guilty beyond reasonable doubt despite alleged inconsistencies in witness testimonies?
2. Was there a breach in the chain of custody of the seized drugs, making it inadmissible evidence?

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

1. ****Resolution of Guilt:**** The Supreme Court upheld the findings of the lower courts, stating that the supposed inconsistencies in witness testimonies were minor and did not pertain to material elements of the crime. The courts emphasized the weight of the positive identification and arrest of Cadidia with the contraband.

2. **Chain of Custody:** The Court found that the chain of custody was sufficiently demonstrated, despite Cadidia's claims otherwise. The drugs passed through hands in a documented sequence that preserved its integrity. The marking of items, stipulated facts, and subsequent positive identification by witnesses further assured the chain's integrity.

Doctrine:

In drug-related cases, minor inconsistencies in witness testimonies do not necessarily discredit their accounts. Positive identification of the accused in transporting illegal substances and a demonstrated, unbroken chain of custody of the contraband are critical to conviction. The presumption of regularity in the performance of police duties stands unless convincingly rebutted by evidence of ill-motive or misconduct.

Class Notes:

- **Illegal Transportation of Drugs:** Know the elements required under Republic Act No. 9165, Section 5.
- **Chain of Custody:** Understand the necessity of documented and uninterrupted transfer from seizure to courtroom presentation to contest its admissibility.
- **Witness Testimony in Drug Cases:** Minor discrepancies are tackled by courts with focus on corroborative details that support main incriminating facts.

Historical Background:

The case reflects heightened scrutiny in airport security post-9/11, leading to stringent inspections aiding in drug interdiction. It also underscores due process concerns in Philippine law related to evidence integrity and rights of the accused in criminal trials, heightened under RA 9165, the Comprehensive Dangerous Drugs Act of 2002.