

****Title:**** People of the Philippines v. Dina Calates y Dela Cruz

****Facts:****

On April 22, 2003, a buy-bust operation was conducted by the Bacolod City police force upon receiving information from a reliable informant that a certain “Dangdang” Calates was engaged in the sale of illegal drugs. Led by Insp. Jonathan Lorilla, the team including PO1 Sonido, who acted as a poseur-buyer, approached Dina Calates y Dela Cruz at her residence. There, an exchange took place — Sonido handed marked money to Calates, who in turn gave him a small sachet of methamphetamine hydrochloride (shabu). Immediately, Sonido identified himself and arrested Calates, while officers from the back-up team assisted in securing her. The seized drug was marked, recorded, and submitted to the crime laboratory for testing. Dina was subsequently charged with violating Section 5, Article II of R.A. No. 9165 (Comprehensive Dangerous Drugs Act of 2002).

Calates contested the charge, asserting that she was merely attending to domestic chores during the alleged transaction and had inadvertently become entangled in a separate police operation targeting another individual. Despite her defense, the Regional Trial Court (RTC) in Bacolod City convicted her of the offense, sentencing her to life imprisonment and imposing a fine. Her appeal to the Court of Appeals (CA) was initially unsuccessful, as the CA affirmed the RTC’s decision.

****Issues:****

1. Whether the prosecution proved Dina Calates’ guilt beyond reasonable doubt.
2. Whether the documented chain of custody of the seized drugs complied with procedural requirements.
3. Whether inconsistencies in the testimonies of the prosecution witnesses affected the case outcome.
4. Whether police procedural lapses justified the application of the reasonable doubt standard benefiting the accused.

****Court’s Decision:****

1. ****Guilt Beyond Reasonable Doubt:**** The Supreme Court found that the prosecution failed to establish Dina’s guilt beyond reasonable doubt. It highlighted a lack of credible evidence since the required physical inventory and photographic documentation were not complied with, raising questions about the integrity of the chain of custody of the seized drugs.
2. ****Chain of Custody:**** The Court emphasized strict adherence to the chain of custody rule

as crucial for upholding convictions in drug cases. The arresting officers failed to justify their non-compliance with the procedural requirements under Section 21 of R.A. 9165, particularly the absence of a physical inventory and photographs taken in the presence of Dina and third-party witnesses.

3. **Credibility of Testimonies:** The alleged procedural lapses cast doubt on the prosecution witnesses' narrative. Without appropriate justifications from the prosecution for these lapses, a reasonable doubt persisted concerning the accused's actual involvement in the drug transaction.

4. **Procedural Lapses:** The Court reiterated the necessity for procedural compliance and the failure to provide a justified reason for deviations effectively weakened the prosecution's case. The saving clause in the dangerous drugs law cannot be availed of without credible explanation for non-compliance, thereby necessitating the acquittal of Dina due to the prosecution's failure to meet the burden of proof.

Doctrine:

The case reiterates the importance of the procedural safeguards under Section 21 of R.A. No. 9165, emphasizing that non-compliance must be justified on clear grounds to preserve the integrity and evidential value of seized items. Without such justification, the corpus delicti is rendered vulnerable, warranting acquittal for reasonable doubt.

Class Notes:

- **Elements of Illegal Sale of Dangerous Drugs:** Identity of the buyer and seller, the transaction or sale, and the delivery of the drug and the corresponding consideration for it.
- **Chain of Custody Rule:** Mandates diligent documentation and preservation of the integrity of seized drugs to secure evidential strength.
- **Section 21, R.A. No. 9165 (as amended):** Requires officers to conduct an immediate inventory and photograph seized drugs in the presence of the accused or representatives from specified public entities to ensure procedural integrity.
- **Proof beyond Reasonable Doubt:** Standard requiring moral certainty, not absolute certainty, with the prosecution bearing the full burden to eliminate any reasonable doubt of the accused's guilt.

Historical Background:

The case occurs in the context of the Philippines' comprehensive anti-drug legislation aimed at combating the proliferation of illegal drugs. R.A. No. 9165 was enacted to standardize

procedures for law enforcement in drug-related crimes, reflecting both the law's stricter focus and the challenges of maintaining evidentiary integrity amid increasing buy-bust operations. This case underscores the judiciary's vigilance in ensuring procedural rights are not compromised under aggressive anti-drug operations.