

Title: People of the Philippines vs. Rolando Araneta y Abella and Marilou Santos y Tantay

Facts:

- Initial Incident:** On July 5, 2002, Rolando Araneta y Abella and Marilou Santos y Tantay, a couple living in Barangay Putol, Rosario, Pasig City, were reported by a confidential informant to the police for peddling illegal drugs. SPO4 Numeriano de Lara, Officer-In-Charge of the Station Drug Enforcement Unit (SDEU) of the Pasig City Police Station, formed an entrapment team comprising of SPO2 Dante Zigapan, PO2 Danilo Damasco, PO1 Orig, and PO1 Bede Montefalcon.
- Buy-Bust Operation:** SPO2 Dante Zigapan appointed PO2 Danilo Damasco as the poseur-buyer and gave him a marked P100 bill for the buy-bust operation. The entrapment team, accompanied by the informant, went to the couple's location around 4:10 AM.
- Transaction:** Upon identifying the suspects, PO2 Damasco and the informant approached them. Marilou asked PO2 Damasco if he was looking to buy drugs; she received the marked money after some initial conversation. Marilou called Rolando, who handed her a plastic sachet of what PO2 Damasco later confirmed to contain shabu (methamphetamine hydrochloride) after receiving the money.
- Arrest:** Upon receiving the pre-arranged signal from PO2 Damasco, the other members of the team moved in to arrest Marilou and Rolando. The marked bill was retrieved from Rolando, and subsequent frisking yielded one plastic sachet of marijuana and additional sachets of methamphetamine.
- Evidence Handling:** At the station, the entrapment team prepared a request for the examination of the confiscated items, which were found to be positive for illegal drugs by the police laboratory.
- Defense's Argument:** The accused claimed they were unlawfully arrested, arguing that there was no valid search warrant and that the search of their house yielded no illegal items. They argued the police planted the drugs and demanded P20,000 for their release, which they refused.
- Procedural History:** The RTC found both accused guilty of violating Sections 5 and 11 of Article II of R.A. 9165, sentencing them to life imprisonment and imposing fines. The

accused appealed to the CA, which upheld the RTC's decision. They then escalated the appeal to the Supreme Court.

****Issues:****

1. Whether the prosecution established beyond reasonable doubt that the drugs seized were the same as those sold by and confiscated from the accused.
2. Whether the accused's arrest and the seizure of evidence were legal.
3. Whether the testimonies of the prosecution witnesses, and the buy-bust operation, were credible and legally conducted.

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

1. ****Affirmation of Guilt:**** The Supreme Court affirmed the decisions of the lower courts, ruling that the accused were guilty beyond reasonable doubt. The Court reiterated that key elements necessary for prosecuting illegal drug sale were met, including the identities of both buyers and sellers, the drug's delivery, and payment acceptance.
2. ****Legitimacy of Buy-Bust Operation:**** The court applied the "objective test" from *People v. Doria* to ascertain that the buy-bust operation was legitimate and conducted properly. The details of the transaction, from initial contact to consummation of the drug sale, were satisfactorily established through PO2 Damasco's testimony.
3. ****Rejection of Defense Arguments:**** The defense's allegations of frame-up, extortion, and planting of evidence were dismissed due to lack of substantiation. The court gave credence to the presumption of regularity afforded to the police officers' official conduct.
4. ****Admissibility of Evidence:**** The seizure was ruled valid and incidental to the accused's rightful apprehension in a buy-bust operation, justifying the lack of a search warrant.
5. ****Late New Issues:**** The Supreme Court declined to entertain corpus delicti-related arguments and procedural objections about the evidence as these were raised only after decisions by lower courts, contravening fair play and due process.

****Doctrine:****

- The "objective test" in buy-bust operations demands thorough scrutiny of the transaction's details, ensuring no lawful inducement of crime.
- Presumption of regularity supports law enforcement officers' acts unless convincingly rebutted.

- A buy-bust operation and search incidental to a lawful arrest are recognized legal practices, negating the necessity for a warrant.

****Class Notes:****

- ****Key Elements for Illegal Drug Sale Prosecution:**** Identification of buyer/seller, object/consideration of sale, and delivery/payment.
- ****"Objective Test":**** Requires demonstration of transaction's detail from initiation (contact) to completion (sale/delivery).
- ****Buy-Bust Operation Justifications:**** Warrantless arrest is valid under Rule 113, Sec. 5(a) of the Rules of Court if executed in flagrante delicto.

****Historical Background:****

- The case occurred amidst efforts to strengthen anti-drug policies in the Philippines via R.A. 9165 (Comprehensive Dangerous Drugs Act of 2002).
- Buy-bust operations became a favored enforcement tool in narcotics control, essential in equipping law enforcement with methods to combat rampant drug trade issues.