

Case Brief: People v. Cantalejo

Title: People of the Philippines vs. Cesar Cantalejo Y Manlangit

Facts:

- Initial Report:** On January 20, 2004, shortly after midnight, two male police informants reported to the DPIU at Camp Karingal about the illegal drug activities of “Cesar” on Esteve Street, Commonwealth Avenue, Quezon City.
- Operation Planning:** A buy-bust team was organized, with SPO4 Celso Jeresano as the team leader and PO2 Paul Acosta designated as the poseur-buyer. PO2 Acosta was provided with a marked PHP 500 bill.
- Surveillance and Execution:** The team arrived at the scene around 1:00 a.m. PO2 Acosta, accompanied by one of the assets, moved closer to the target location using a tricycle. Upon meeting Cesar outside his house, the asset introduced Acosta as his friend. Acosta indicated his intent to buy PHP 500 worth of shabu. Cesar took the money and returned with a plastic sachet containing shabu.
- Arrest and Evidence Collection:** After the exchange, PO2 Acosta signaled his team, resulting in Cesar’s arrest. PO1 Cruda searched Cesar and found the marked PHP 500 bill. Cesar and the seized items were taken to Camp Karingal, with the sachet of shabu later analyzed and confirmed by the laboratory.
- Defense’s Version:** The defense claimed that Cesar and his family were sleeping during the incident, and they were awoken by aggressive police officers who forcefully entered and searched their house, pointing guns at them and demanding shabu, which they denied having. Cesar was thereafter arrested and brought to Camp Karingal.
- Trial Court Decision:** On April 28, 2006, RTC Quezon City Branch 103 found Cesar guilty of violating Section 5 of R.A. No. 9165, sentencing him to life imprisonment and imposing a fine of PHP 500,000.
- Appeal to Court of Appeals:** Cesar contested that his presumption of innocence was violated and that his rights against unreasonable searches and seizures were ignored. On November 21, 2007, the Court of Appeals affirmed the RTC’s decision.

Issues:

1. **Sufficiency of Evidence:** Whether the prosecution has proven beyond reasonable doubt all the elements of the illegal sale of dangerous drugs.
2. **Presumption of Innocence:** Whether the trial court and the Court of Appeals correctly applied the presumption of innocence in favor of the accused.
3. **Validity of Arrest:** Whether the warrantless search and subsequent arrest of the accused complied with constitutional standards.
4. **Chain of Custody:** Whether the chain of custody of the seized drugs was properly established, complying with the procedural requirements of Section 21 of R.A. No. 9165.

Court's Decision:

1. **Insufficient Evidence:** The Supreme Court found that the prosecution heavily relied on the testimonies of police officers without solid corroborative evidence. Additional witnesses from the backup team were necessary to substantiate the prosecution's claims. Given the conflicting narratives from the prosecution and defense, the presumption of innocence must prevail.
2. **Failure to Rebut Defense's Claims:** The prosecution did not present rebuttal evidence against the defense's accounts of unlawful entry and search. The accused's wife's testimony indicated the police officers' lack of knowledge about the accused, weakening the prosecution's case.
3. **Chain of Custody Issues:** Testimonies from P02 Acosta and P01 Cruda revealed inconsistencies and non-compliance with the requirements of conducting physical inventory and photographing the seized drug as mandated by Section 21, Paragraph 1, Article II, R.A. No. 9165.
4. **Presumption of Regularity Invalidated:** Given the procedural lapses and substantial irregularities in the operation, the presumption of regularity in police actions was effectively annulled.

Doctrine:

1. **Presumption of Innocence:** The legal presumption of innocence prevails if the prosecution cannot present definitive evidence to prove guilt beyond reasonable doubt.

2. **Chain of Custody:** Strict adherence to procedural requirements under Section 21 of R.A. No. 9165 is crucial to validating the integrity of the seized narcotics. Non-observance invalidates the presumption of regularity and weakens the prosecution's case.

Class Notes:

- **Elements of Offense in Illegal Drug Sales:**

1. Proof of transaction or sale.
2. Presentation of the illicit drug (corpus delicti).
3. Identification of buyer and seller.

- **Chain of Custody:**

- Physical inventory and photograph of seized drugs.
- Actions must occur in the presence of witnessed individuals including the accused, media, and elected officials.
- Documentation signed by witnesses.

- **Presumption of Regularity vs. Constitutional Rights:**

- While officers are presumed to act regularly, this presumption does not supersede the constitutional presumption of innocence.

- **Standard of Proof:**

- Guilt must be established beyond reasonable doubt. Absent this, acquittal is warranted.

Historical Background:

The decision reiterated the jurisprudential precedent on the importance of strict compliance with the procedural safeguards under the Comprehensive Dangerous Drugs Act of 2002. This case highlighted the judiciary's vigilance against procedural lapses that could undermine constitutional protections and underscored the critical role of due process in the Philippine legal system.