

Title: People of the Philippines vs. Teresita Aranda y Doria, G.R. No.

Facts:

****Background and Arrest:****

1. On August 17, 1990, at approximately 5:00 p.m., Private First Class (Pfc.) Alexander Corpuz of the Anti-Narcotics Unit of the Kalookan City Police Station received a tip from an informant that a tricycle driver with plate number NM-4831 was set to purchase “shabu” from Teresita Aranda.
2. Lieutenant Eliseo de Leon formed a team to investigate, appointing Pfc. Corpuz as the team leader with Pfc. Elmario Adelante and Patrolman (Pat.) Romeo Sengco as members.
3. The team proceeded to the specified location in a jeep owned by Pfc. Corpuz and observed the area.
4. The tricycle matching the informant’s description appeared. Shortly after, Teresita Aranda appeared, carrying a shoulder bag, and approached the tricycle.

****Transaction and Arrest:****

5. Witnesses testified seeing Aranda hand over small plastic bags to the tricycle driver, Benito Villanueva.
6. As Aranda attempted to board the tricycle, Pfc. Corpuz signaled his team who quickly apprehended Villanueva and Aranda, recovering from them plastic bags containing suspected methamphetamine hydrochloride.

****Trial Court Proceedings:****

1. Teresita Aranda was charged with violating Section 15, Article III of the Dangerous Drugs Act (R.A. No. 6425 as amended) and pleaded “not guilty”.
2. Pfc. Corpuz and others provided testimony supporting the prosecution’s account.
3. Benito Villanueva, charged in a separate case, pled guilty to his charges and was sentenced to six years and one day of imprisonment, along with a fine.
4. Defense witnesses, including Aranda, provided an alternative account, denying the

charges and contending the arrest was without proper cause and that no drugs were sold or delivered by Aranda.

Issues:

1. Whether the trial court erred in giving weight to the testimonies of the prosecution witnesses despite noted discrepancies.
2. Whether the trial court erred in convicting the accused-appellant despite lack of concrete evidence showing the sale of prohibited drugs.
3. Whether the trial court erred in refusing to give credence to the testimonies of the prosecution's own witness, including Benito Villanueva.

Court's Decision:

****Ruling on Prosecution Witnesses:****

1. The Supreme Court found notable discrepancies in the testimonies of the apprehending officers which doubted the reliability of their accounts.

****Ruling on Evidence of Sale and Delivery:****

2. The prosecution failed to prove the essential element of "sale and delivery" by the appellant to Villanueva beyond a reasonable doubt.

****Ruling on Testimony of Benito Villanueva:****

3. Benito Villanueva's testimony did not corroborate the claim that Teresita Aranda delivered the drugs to him.

****Legal Analysis:****

1. The inconsistencies in the testimonies were significant and unaddressed, questioning the credibility of the prosecution's case.
2. The testimony of Villanueva as a prosecution witness discredited their case rather than supported it. The failure to declare this witness hostile kept the prosecution bound by his statements, which contradicted their claims.

3. The prosecution did not establish beyond reasonable doubt either the delivery of the drugs by Aranda or her knowledge that the delivered items were prohibited drugs.

Doctrine:

1. **Consistency in Testimony:** In coordinating law enforcement operations and official statements, consistency is crucial in maintaining credibility.
2. **Proof Beyond Reasonable Doubt:** The burden rests on the prosecution to prove each element of the crime charged beyond a reasonable doubt, including the accused's knowledge and delivery of prohibited substances.
3. **Witness Credibility:** Failure to declare a witness hostile when they give contradictory testimony binds the prosecution to the witness's statements.

Class Notes:

1. **Elements of Illegal Drug Sale and Delivery:**
 - Sale and delivery of prohibited drug.
 - Knowledge that the substance is prohibited.
2. **Key Statutory Provision:**
 - Section 15, Article III, Dangerous Drugs Act (R.A. No. 6425 as amended).
3. **Hostile Witness Rule (Sec. 12, Rule 132, Rules of Evidence):**
 - Procedure and necessity for declaring a witness hostile to impeach credibility.

Historical Background:

This case illustrates the pivotal importance of consistency and credibility in law enforcement testimonies and the stringent standards of proof in criminal cases within the Philippine legal system. Reflective of the late 20th century judicial processes in the Philippines, the case underscores the judicial scrutiny placed on procedural lapses and inconsistencies. This period also saw heightened awareness and enforcement of laws related to narcotics, with significant legal milestones shaping the jurisprudence concerning drug-related offenses.