

Title: Spouses Joel and Marietta Marimla v. People of the Philippines and Hon. Omar T. Viola, RTC Judge, Branch 57, Angeles City

Facts:

- Application for Search Warrant:** On February 15, 2002, SI Ray C. Lagasca from the NBI Anti-Organized Crime Division filed applications for two search warrants with the RTC of Manila for properties in Angeles City and Porac, Pampanga, alleging violations of Section 16, Article III of RA No. 6425.
- Issuance of Search Warrant:** Executive Judge Mario Guariña III, after examining SI Lagasca and another witness, Roland D. Fernandez, issued Search Warrant No. 02-2677 allowing a search of the Marimla's house in Angeles City for drugs and related paraphernalia.
- Search and Seizure:** On February 19, 2002, the NBI, in coordination with the PNP, conducted a search and seized cash and various quantities of marijuana.
- Filing of Information:** An Information for Violation of Section 8, Article II of RA No. 6425 was filed against the petitioners in the RTC of Angeles City, Branch 57.
- Motion to Quash:** On March 25, 2002, the petitioners moved to quash the search warrant and suppress the seized evidence, arguing that the warrant was issued outside the territorial jurisdiction of the Manila court, among other legal grounds.
- Motions to Admit Evidence:** In support of their motion to quash, the petitioners filed to admit several documents challenging the authorization process of the search warrant application.
- Opposition:** The Office of the City Prosecutor opposed the motion, citing administrative orders allowing the RTC of Manila to issue such warrants.
- Judge's Decision:** On September 6, 2002, Judge Omar T. Viola denied the Motion to Quash and Suppress for lack of merit. The petitioners' subsequent Motion for Reconsideration was also denied on April 21, 2003.
- Petition for Certiorari:** The petitioners then brought a Petition for Certiorari under Rule 65 to the Supreme Court, arguing grave abuse of discretion by the RTC.

Issues:

- Whether A.M. No. 99-10-09-SC allows the issuance of a search warrant outside the territorial jurisdiction of the RTC of Manila.**
- Whether the application for the search warrant was defective due to the lack of personal endorsement by the NBI Head and signed instead by a deputy director.**

3. **Whether the search warrant was void ab initio due to alleged procedural violations.**
4. **Whether the RTC acted with grave abuse of discretion in denying the Motion to Quash and the suppression of evidence.**
5. **Whether the Supreme Court should take jurisdiction of the petition despite the hierarchy of courts principle.**

Court's Decision:

1. **Jurisdiction Under A.M. No. 99-10-09-SC:**

- The Supreme Court held that A.M. No. 99-10-09-SC indeed authorized Executive Judges from the RTCs of Manila and Quezon City to issue search warrants enforceable outside their territorial jurisdictions, particularly for specific crimes such as dangerous drugs.
- The administrative order had not been superseded by the later issuance of the Revised Rules on Criminal Procedure.

2. **Delegation of Authority:**

- The Supreme Court found no defect in the application for the search warrant being endorsed by Deputy Director Nasol. It cited administrative regulations allowing officers to delegate clerical or ministerial functions to subordinates unless prohibited by law.

3. **Search Warrant's Validity:**

- The Court upheld the validity of the search warrant, emphasizing that A.M. No. 99-10-09-SC remained in effect and permitted such exercises of authority.

4. **RTC's Denial of Motion to Quash:**

- The Court found that Judge Viola's orders denying the Motion to Quash were not an act of grave abuse of discretion as there was compliance with both procedural and substantive requirements.

5. **Hierarchy of Courts:**

- While addressing the OSG's argument, the Supreme Court determined it appropriate to take direct cognizance of the case given the novel issues concerning procedural rules it promulgated.

Doctrine:

1. **Authority Under Administrative Matters:** A.M. No. 99-10-09-SC allows the RTCs of Manila and Quezon City to issue search warrants effective beyond their territorial

jurisdiction for certain enumerated crimes.

2. **Delegation of Ministerial Functions:** Delegation of clerical or ministerial tasks to an authorized deputy is lawful unless explicitly prohibited by law or regulation.

Class Notes:

1. **Section 2, Rule 126 of the Revised Rules on Criminal Procedure:** Governs the jurisdiction for filing applications for search warrants.

2. **A.M. No. 99-10-09-SC:** Special procedural exception allowing select RTCs to issue wide-reaching search warrants.

3. **Delegation of Authority:** Recognition under administrative law for heads of agencies to delegate ministerial duties.

4. **Hierarchy of Courts Exception:** The Supreme Court may directly address petitions bypassing lower courts for compelling reasons or novel jurisdictional issues.

Historical Background:

The case reflects judicial adjustments to operationalize effective crime-fighting mechanisms by law enforcement agencies in the Philippines, particularly concerning the illegal drug trade, through specially designated judicial provisions. The Administrative Matters tailored legal processes to address serious crimes more efficiently, showcasing the judiciary's proactive role in evolving procedural rules critical for law enforcement.