

Title:

People of the Philippines vs. Nasario Molina y Manamat alias “Bobong” and Gregorio Mula y Malagura alias “Boboy”

Facts:

In June 1996, Philippine National Police received information about a marijuana pusher in Davao City. SPO1 Marino Paguidopon spotted the suspect, Mula, in July. On August 8, 1996, Paguidopon was informed that the pusher would pass through NHA, Ma-a, Davao City. A police team intercepted a “trisikad” carrying the accused-appellants, who were found in possession of a bag containing 946.9 grams of dried marijuana.

Accused-appellants filed a demurrer to evidence, arguing the evidence was inadmissible due to the unconstitutional search and seizure, which the trial court denied. They opted not to present evidence and filed a joint memorandum. On April 25, 1997, the Regional Trial Court found them guilty, imposing the death penalty. The case was automatically reviewed by the Supreme Court.

Issues:

1. Admissibility of marijuana seized without a warrant.
2. Sufficiency of evidence for guilt beyond reasonable doubt.
3. Correct penalty for the crime, considering aggravating circumstances.

Court’s Decision:

The Supreme Court reversed the trial court’s decision, citing violation of constitutional rights against unreasonable searches and seizures. The arrest was deemed invalid as it did not meet the exceptions for warrantless arrests. Specifically, accused-appellants’ behavior did not indicate they were committing, attempting to commit, or had committed a crime in the officers’ presence. The “overt act” did not justify a suspicion of criminal activity. Thus, the search and seizure were illegal, and the evidence obtained was inadmissible.

Issue per issue, the Court decided:

1. The marijuana seized during the warrantless search and seizure was inadmissible.
2. There was insufficient evidence to prove guilt beyond a reasonable doubt due to the inadmissibility of the seized drugs.
3. Given the acquittal of the accused-appellants, the discussion on the penalty was moot.

Doctrine:

- The exclusionary rule: Evidence obtained in violation of the constitutional right against

unreasonable searches and seizures is inadmissible for any purpose in any proceeding.

- For a warrantless arrest to be valid, there must be a lawful act indicative of a crime committed in the presence or within the view of the arresting officer.

Class Notes:

Key elements:

- **Unreasonable search and seizure**: Evidence obtained through such acts is inadmissible.
- **Warrantless arrest exceptions**: Must meet specific criteria; otherwise, the arrest and subsequent search are invalid.
- **Evidence admissibility**: Relies on the legality of the method through which evidence was obtained.

Relevant legal statutes:

- **The Philippine Constitution, Article III, Section 2**: Right against unreasonable searches and seizures.
- **Rule 113 of the Rules of Court on Warrantless Arrest**: Specifies conditions under which a warrantless arrest can be made.

Application:

- The Court applied constitutional protections against unreasonable searches and seizures, emphasizing the need for a lawful arrest before a search can be made. The decision underscores the importance of following legal procedures to ensure evidence admissibility.

Historical Background:

This case reflects the judicial system's dedication to upholding constitutional rights, even in the face of efforts to combat illegal drugs. It underscores the balance that must be maintained between enforcing the law and respecting individual rights as enshrined in the Constitution.