

Title:

Lim vs. De Leon, G.R. No. L-22630, 160 Phil. 991 (1976)

Facts:

1. **Sale of Motor Launch "SAN RAFAEL"**:

- On April 29, 1961, Jikil Taha sold a motor launch named M/L "SAN RAFAEL" to Alberto Timbangcaya in Brooke's Point, Palawan.

2. **Complaint of Robbery**:

- On April 9, 1962, Timbangcaya filed a complaint accusing Taha of forcibly taking back the launch.

3. **Preliminary Investigation and Filing of Case**:

- On May 14, 1962, Acting Provincial Fiscal Francisco Ponce de Leon filed an information for robbery against Taha (Criminal Case No. 2719).

4. **Seizure of the Motor Launch**:

- On June 15, 1962, Fiscal Ponce de Leon requested the Provincial Commander of Palawan to impound the motor launch upon hearing it was in Balabac, Palawan.

- After reiterating the request on June 26, 1962, Detachment Commander Orlando Maddela seized the motor launch from Delfin Lim on July 6, 1962.

5. **Attempts to Recover the Launch**:

- Lim and Taha made several attempts to reclaim the launch but were rebuffed.

6. **Civil Case for Damages**:

- On November 19, 1962, Lim and Taha sued De Leon and Maddela in the Court of First Instance (CFI) of Palawan, seeking damages for the alleged illegal seizure.

7. **Trial Court Decision**:

- On September 13, 1965, the CFI dismissed their complaint and awarded damages to the defendants.

8. **Appeal**:

- Lim and Taha appealed to the Supreme Court.

Issues:

1. **Authority to Seize Without Warrant**:

- Whether Fiscal Ponce de Leon had the authority to order the seizure without a warrant.

2. **Civil Liability for Damages**:

- Whether De Leon and Maddela were liable for damages.

Court's Decision:

1. **Authority to Seize Without Warrant**:

- The Supreme Court ruled that Fiscal De Leon did not have the authority. The Constitution mandates that only a judge can determine probable cause and issue a search warrant. Seizures must be reasonable and performed with a valid search warrant. De Leon had sufficient time to obtain a warrant but failed to do so. Thus, the seizure was unconstitutional.

2. **Civil Liability for Damages**:

- **Delfin Lim's Claims**:

- The Court found that Lim was entitled to actual damages (PHP 3,000.00), moral damages (PHP 1,000.00), and attorney's fees (PHP 750.00). These were supported by evidence of the purchase agreement and the motor launch's devaluation.

- **Jikil Taha's Claims**:

- The Court did not grant damages to Taha as he no longer owned the motor launch at the time of seizure and thus lacked standing to sue.

- **Fiscal De Leon's Liability**:

- Despite arguing good faith, the Court held De Leon liable under Article 32 of the New Civil Code, which does not require malice or bad faith for liability.

- **Orlando Maddela's Exemption**:

- Maddela was exonerated due to acting under direct orders from De Leon, with a reasonable belief of legality backed by his superior's communications.

Doctrine:

1. **Constitutional Limits on Warrantless Searches and Seizures**:

- Only judges possess the authority to issue warrants upon finding probable cause.
- Seizure without a warrant is unconstitutional, even if the item is the corpus delicti.

2. **Article 32, New Civil Code**:

- Violations of constitutional rights by public officers lead to civil liability for damages regardless of malice or good faith.

Class Notes:

- **Elements of a Valid Search Warrant**:

- Probable cause determined by a judge.

- Examination of the complainant and witnesses under oath.
- Specific description of the place to be searched and items to be seized.
- **Article 32, New Civil Code**:
 - Ensures public officers can be held liable for violating constitutional rights without needing to prove malice.
- **Article 2219, New Civil Code**:
 - Provides for moral damages for illegal searches and other analogous cases.

Historical Background:

- **Context of the Case**:
 - This case unfolded during a period in Philippine history where maintaining a balance between prosecutorial powers and individual constitutional protections was critical.
 - The case reinforced the principles of reasonable search and seizure, emphasizing judicial oversight over prosecutorial discretion in issuing search warrants.

This case serves as a pivotal reference for ensuring that prosecutorial actions respect constitutional boundaries, safeguarding individual rights against arbitrary state actions.