

Title: People of the Philippines vs. Jesusa Figueroa y Coronado

Facts:

- On June 20, 2004, an informant reported the drug activities of Jesusa Figueroa, known as "Baby," to the PNP's Anti-Illegal Drugs Special Operations Task Force (AIDSOTF).
- Superintendent Nelson T. Yabut directed officers Garcia, Callora, and Pinili to investigate.
- On June 23, Callora and the informant met "Figueroa" at SM Bicutan. Figueroa expressed her lack of shabu but promised to inform when available.
- On July 2, 2004, Figueroa communicated her procurement of shabu.
- A buy-bust operation was set at a 7-Eleven in Pasig City with PO3 Callora as the poseur-buyer, equipped with specially marked two Php 500 bills.
- Figueroa arrived in a Toyota Revo. Upon showing the shabu, she noticed the police presence and fled.
- The police pursued and subsequently detained her. During the arrest, a boy threw a Chowking plastic bag containing shabu out of the car.
- Figueroa was arrested, and the substances tested positive for methamphetamine hydrochloride.

Procedural Posture:

- Figueroa was charged in two Informations: one for possession and one for attempted sale of shabu.
- She pleaded not guilty, proceeding to trial in the Makati RTC.
- The RTC acquitted her of possession but convicted her of attempted sale, sentencing her to life imprisonment and a fine.
- She appealed, which was denied by the Court of Appeals.
- Figueroa further appealed to the Supreme Court.

Issues:

1. Whether the buy-bust operation was valid despite lacking coordination with PDEA.
2. Whether there was an agreement for a drug sale between Callora and Figueroa.
3. Whether the conflicting testimonies of Callora and Garcia affected the credibility of the prosecution's case.
4. Whether the conviction for an attempt to sell was appropriate.

Court's Decision:

1. The Court held the operation valid despite lacking PDEA coordination since statutory silence does not infer illegality.

2. The Court affirmed the transaction's validity; an established attempt sufficed through Figueroa's actions, observed directly by Callora.
3. Discrepancies in testimonies, unrelated to the crime's central fact, don't affect officer credibility, following assumption of regular procedure adherence.
4. Upheld conviction for attempted sale; Figueroa's actions met the overt acts required under definitions in the Revised Penal Code and Republic Act.

Doctrine:

- The absence of PDEA coordination doesn't nullify a buy-bust operation's legality.
- Statements leading to a buy-bust operation are purposes of providing background, not establishing the truth.

Class Notes:

- Criminal Law: Attempt (Article 6, Revised Penal Code)
- Dangerous Drugs Act (R.A. 9165, Sections on Sale and Attempt)
- Procedural: Confrontation Clause doesn't apply where independently relevant statements are at issue.

Historical Background:

- This case reflects the intensified Philippine efforts under Republic Act No. 9165 to combat illicit drug trafficking, marking operational flexibilities for law enforcement despite statutory procedural deviations.