

Title:

People of the Philippines vs. Donaldo Padilla y Sevilla, G.R. No. 104 OG No. 32, 5361 (2008)

Facts:

Step by Step:

1. On December 20, 1995, Donaldo Padilla y Sevilla and Jose Jb Hidalgo, Jr. y Garcia were alleged to have transported 400.60 grams of Methamphetamine Hydrochloride (“shabu”) in Las Piñas, Metro Manila.
2. Acting on a tip, Las Piñas police conducted a two-week surveillance on Padilla’s residence.
3. On December 19, 1995, a search warrant for Malou Padilla’s (appellant’s wife) residence was issued by the RTC of Imus, Cavite.
4. On December 20, 1995, the police, led by SPO2 Mabini Rosale and Police Inspector Virgilio Pelaez, carried out the search at around 2:30 a.m.
5. A Nissan Altima car bearing Plate No. UBD-109 was seen speeding away as police arrived at Padilla’s residence.
6. With the help of Antonio Antonio, the President of the BF Homeowners’ Association, the police searched the residence and recovered aluminum foils and suspected shabu tubes.
7. While still at the residence, a security guard informed police of a red Toyota car attempting to enter the village.
8. On inspection, driver Hidalgo opened the trunk revealing Padilla hiding inside. Padilla handed over a blue plastic bag containing packs of shabu to the police.
9. Padilla was arrested and brought to NARCOM Headquarters, Quezon City. Laboratory tests confirmed the presence of Methamphetamine Hydrochloride.
10. The defense presented a different account, alleging extortion attempts by police and claiming that the shabu was planted.

Procedural Posture:

1. Appellant was convicted by the RTC of Las Piñas, Branch 255, on June 3, 2002, and sentenced to death and a fine of P2,000,000.00.
2. On automatic review by the Supreme Court, the case was referred to the Court of Appeals (CA) as per People v. Mateo.
3. The CA, on May 31, 2005, affirmed the conviction but reduced the penalty to reclusion perpetua.

4. The case was then brought back to the Supreme Court on further appeal.

Issues:

1. Whether the prosecution's evidence was sufficient to establish guilt beyond reasonable doubt.
2. Whether the irregularities in the conduct of the police such as searching in unholy hours and lack of presentation of the search warrant affect the conviction.
3. The credibility of police testimonies and presumption of regularity in the performance of official duties vs. the constitutional presumption of innocence.

Court's Decision:

Analysis:

1. **Evidence Sufficiency and Credibility**:

- The Supreme Court found the prosecution's narrative against the natural course of human conduct. Appellant's return to the house and noise-making while hiding were deemed highly implausible.
- The presumption of regularity in official duties does not override the constitutional presumption of innocence. The prosecution's evidence was weak and riddled with inconsistencies.

2. **Irregularity in Police Actions**:

- The prosecution failed to present the search warrant and other critical pieces of evidence, thus weakening their case.
- The service of search warrant at odd hours and the inconsistencies in its presentation further undermined the prosecution's case.

3. **Credibility of Witnesses**:

- The Supreme Court found that biases alleged against defense witnesses were insufficient to dismiss their testimonies.
- Legal presumptions favoring police conduct can only support the prosecution if their case is already strong, which it was not here.

Resolution:

- The Supreme Court reversed and set aside the decisions of the RTC and CA.
- Donaldo Padilla y Sevilla was acquitted due to the failure of the prosecution to prove guilt

beyond reasonable doubt.

- The Court ordered his immediate release unless lawfully detained for another cause.

Doctrine:

- **Presumption of Innocence**: The presumption of regularity in performance of official duties cannot override the constitutional presumption of innocence, particularly where prosecution evidence is weak.

Class Notes:

1. **Presumption of Innocence** (Article III, Sec. 14(2) of the Philippine Constitution):

- The prosecution must eliminate all reasonable doubts as to an accused's guilt.

2. **Search and Seizure** (Rule 126 of the Revised Rules of Court):

- Search warrants must generally be executed in the daytime unless specifically allowed for night service by the court order.

3. **Evidence and Credibility**:

- Prosecution must rely on the strength of its own evidence, not the weakness of the defense.

- Human conduct consistency is crucial in evaluating the credibility of testimonies.

Historical Background:

- Philippine jurisprudence strongly protects the presumption of innocence and sets high standards of proof for criminal conviction.

- The case reiterates the principle that irregularities and non-compliance with procedural requirements can substantially impact the validity of a conviction.

- The ruling aligns with ongoing concerns about police misconduct and the importance of protecting constitutional rights against unlawful searches and seizures.