

Title:

****People of the Philippines v. Marcos, Yu Cua Sio, 203 Phil. 357 (1969)****

Facts:

1. ****Initiation of Search Warrant****:

- On June 15, 1969, NBI Supervising Agent Jose Vicente filed an application with the City Court of Baguio City, asserting that Suntory Grocery, managed by Yu Cua Sio, had stocks of adulterated San Miguel Gin with fake auxiliary stamps, violating Articles 188 and 189 of the Revised Penal Code.

2. ****Issuance of Search Warrant****:

- Based on this application, City Judge Patricio Perez issued Search Warrant No. 459 on the same day, allowing NBI agents to search Suntory Grocery for the specified items.

3. ****Execution of the Search Warrant****:

- On June 19, 1967, the NBI agents executed the search warrant, seizing several items from Suntory Grocery, including suspected adulterated gin, crown cap sealer, auxiliary stamps, and other related paraphernalia.

4. ****Lower Court Proceedings****:

- Yu Cua Sio filed a motion with the City Court to quash the search warrant, which was granted on February 3, 1969, ordering the return of the seized items.
- The Court of First Instance (CFI) of Baguio City initially reversed this decision and upheld the search warrant. However, after a motion for reconsideration, the CFI declared the search warrant null and void on October 13, 1969, and ordered the return of the seized items to Yu Cua Sio.

5. ****Petition to the Supreme Court****:

- The People of the Philippines, through the Solicitor General, petitioned the Supreme Court to review and set aside the CFI's order.

Issues:

1. ****Validity of Search Warrant No. 459****:

- Whether Search Warrant No. 459 was valid, considering it allegedly covered more than one specific offense, violating Section 3, Rule 126 of the New Rules of Court.

2. ****Fishing for Evidence****:

- Whether the search warrant was issued legitimately or merely a means to fish for

evidence.

Court's Decision:

Resolution of Issues:

1. **Validity of the Search Warrant:**

- The Supreme Court found merit in the petition, explaining that while the search warrant did not explicitly state a specific offense, the application by the NBI clearly articulated violations of Articles 188 and 189 of the Revised Penal Code, which are closely related offenses.
- Citing the Solicitor General, the Court observed that the acts defining these offenses are so closely related that they can be considered as inclusively or necessarily including each other. Thus, the warrant did not violate Section 3, Rule 126 of the New Rules of Court.

2. **Fishing for Evidence:**

- The Court disagreed with the lower court's reasoning that the search warrant was issued to fish for evidence. The search warrant aimed to seize articles specified in the application, which were indeed found in Yu Cua Sio's possession.
- Thus, the warrant was not issued as a general fishing expedition but for the specific purpose of substantiating the allegations of possession of adulterated goods and fake stamps.

Final Ruling:

- The Supreme Court set aside the CFI's October 13, 1969 order, and directed Yu Cua Sio to return the seized articles if they had been delivered back to him.

Doctrine:

- **Validity of Search Warrants:** A search warrant that appears to cover closely related or necessarily inclusive offenses does not violate the prohibition against warrants for more than one specific offense.
- **Specification of Offenses in Search Warrants:** The references in the application for a search warrant can collectively define the specific offense even if the warrant itself does not explicitly mention a specific statutory violation.

Class Notes:

- **Key Elements/Concepts:**
- **Search Warrants:** Must be based on probable cause and specify the place to be searched and persons or things to be seized.

- **Section 3, Rule 126 of the New Rules of Court**:

> “No search warrant shall issue for more than one specific offense.”

- **Articles 188 and 189 of the Revised Penal Code**:

- Article 188: Substituting and altering trademarks, tradenames, or service marks.

- Article 189: Unfair competition, fraudulent registration of trademarks.

- Application:

- Warrant Application Containing Specific Allegations: The specificity requirement is met if the application contains detailed allegations covering related offenses.

- Fishing for Evidence Prohibition: Warrants must target specifically alleged and reasonably suspected items, not be used as fishing expeditions.

Historical Background:

- This case reflects the judicial procedures and standards applied during the 1960s in the Philippines, including the interpretation of procedural safeguards under the New Rules of Court. The decision also demonstrates the Court’s approach in balancing the necessity for law enforcement against the protection of individual rights against unreasonable searches and seizures.