

Title: **Mendoza v. People**

Facts:

- **Initial Sighting and Arrest:**

- April 15, 2016, at approximately 10:30 p.m.
- Location: Barangay Palanan, Makati City.
- Police, led by PO3 Rojas and other SAID-SOTG operatives, executed Search Warrant SW-16-288-MN against Jay Tan for RA 9165 and illegal possession of firearms.
- The police forcibly entered the house and found Joemarie Mendoza sitting on the floor with a pen gun, a small sachet of shabu, and two improvised tooters.
- Mendoza was arrested, his rights apprised, and continued their search, finding additional illegal items in a vault.

- **Procedures and Evidence:**

- Seized items were marked, inventoried, photographed, and processed.
- Marking done by PO3 Marcelo, assisted by Barangay Kagawad Jose Villa Jr.
- Preliminary Investigation leading to the indictment:
- The City Prosecutor's Office received various documents including the Final Investigation Report, Laboratory Exam Results, Inventory Receipt, etc.
- Recommended indictment for violations of RA 10591 and Sec. 11 & 12 of RA 9165.
- Two Informations filed at RTC Makati: Criminal Case Nos. R-MKT-16-765-CR (illegal possession of drugs) and R-MKT-16-766-CR (possession of drug paraphernalia).

- **RTC Trial:**

- Mendoza pleaded not guilty.
- Prosecution witnesses included Kagawad Villa, PO2 Gimena, and PO3 Rojas.
- The defense presented Mendoza's denial.
- RTC convicted Mendoza for violations of Sec. 11 and 12 of RA 9165.

- **Appeal to CA:**

- CA affirmed RTC's decision.
- Held that Mendoza could not challenge the search warrant's legality and the evidence was validly obtained.
- It was ruled that Mendoza was found in possession of the items in plain view.

Issues:

1. Whether the CA erred in affirming Mendoza's conviction despite the invalid search warrant and the inadmissibility of evidence.
2. Whether CA erred in affirming the conviction despite police non-compliance with Sec. 21, Art. II of RA 9165 as amended.

Court's Decision:

Search Warrant's Defects:

- Found invalid for covering two separate offenses (RA 9165 and RA 10591), violating the one-specific-offense rule under the Revised Rules of Criminal Procedure.
- The Court invalidated the search warrant leading to the arrest and seizure.

Inadmissibility of Evidence:

- Waiver of arrest validity doesn't affect evidence inadmissibility.
- Evidence seized due to an invalid search warrant is inadmissible.
- The plain view doctrine was not applicable, as the initial intrusion was invalid.

Chain of Custody Rule:

- The police failed to comply with the mandated witnesses during inventory, violating Sec. 21 of RA 9165.
- The integrity of the seized drugs was compromised, signaling a break in the chain of custody, warranting Mendoza's acquittal.

Doctrine:

- **One-Specific-Offense Rule:** A search warrant must be strictly limited to one specific offense to avoid scatter-shot warrants, ensuring more precise and probable cause determinations.
- **Illegally Seized Evidence:** Evidence obtained under an invalid search warrant is inadmissible regardless of subsequent waiver to challenge the arrest.
- **Compliance with Chain of Custody:** Strict adherence to procedures in RA 9165 is necessary to maintain the integrity of evidence in drug cases.

Class Notes:

- **One-Specific-Offense Rule:** Procedural safeguards ensure warrants are specific and founded on probable cause.
- **Plain View Doctrine:** Requires initial lawful intrusion for the doctrine to apply and does

not circumvent invalid searches.

- **Chain of Custody:** Essential to establish evidence integrity in drug cases, failure to comply necessitates acquittal.
- **Relevant Statutory Provisions:** The Revised Rules of Criminal Procedure, Sec. 21 of RA 9165, Art. III Sec. 2 of the Constitution (protection against unreasonable searches and seizures).

Historical Background:

- The case highlights stringent judicial interpretations aligned with protecting constitutional rights against unreasonable search and seizure.
- Reflects ongoing legal evolution to ensure police compliance with procedural and constitutional mandates in drug-related offenses.