Title: People of the Philippines v. Court of Appeals and Azfar Hussain et al.

Facts:
1. On December 14, 1995, PNP Inspector James Brillantes applied for a search warrant against Azfar Hussain for alleged illegal possession of firearms and explosives at Abigail Variety Store, Apt. 1207, San Jose del Monte, Bulacan.

2. On December 15, 1995, Judge Marciano Bacalla issued Search Warrant No. 1068, targeting the Abigail Variety Store. However, the search occurred at Apt. No. 1, adjacent to the store, resulting in the arrest of four Pakistani nationals and the seizure of personal properties and explosives unrelated to the warrant.

3. On December 19, 1995, a return of the search warrant was made, omitting details of the seized articles not listed in the warrant.

4. On January 22, 1996, the accused, upon arraignment at the RTC Branch 80 in Bulacan, pleaded not guilty and filed a motion to quash the search warrant and suppress evidence.

5. On January 30, 1996, a court-ordered ocular inspection confirmed that Apt. No. 1 and Abigail Variety Store were separate entities without connecting doors.

6. On February 9, 1996, Judge Caesar Casanova quashed the search warrant, deeming the evidence obtained inadmissible since the place searched was not that described in the warrant.

7. Subsequent motions for reconsideration were filed by the Provincial Prosecutor but were denied by the trial court.

8. The Solicitor General initiated a certiorari action in the Court of Appeals, which upheld the trial court’s decision on September 11, 1996, leading to an appeal to the Supreme Court.

Issues:
1. Whether the search warrant was validly issued with a specific description of the place to be searched.
2. Whether the evidence obtained in the search was admissible in court.
3. The propriety of the trial court’s actions in quashing the search warrant and suppressing the evidence.
4. Whether the Court of Appeals erred in dismissing the People’s petition for certiorari.

Court’s Decision:
1. The Supreme Court ruled that the search warrant was invalid due to its failure to particularly describe the place to be searched, as required by the Constitution. The warrant specified a different location from where the search was conducted, invalidating the operation.

2. Given the invalid warrant, evidence seized from Apt. No. 1 was inadmissible in court. The constitutional mandate for particularity in search warrants aims to prevent unreasonable searches.

3. The trial court acted within its jurisdiction in considering the motion to quash the search warrant, despite not being the issuing court, addressing jurisdictional concerns post-search warrant execution.

4. The Court of Appeals decision was upheld, affirming the trial court’s orders due to adherence to constitutional protections against unreasonable searches and evidence suppression arising from the invalid warrant.

Doctrine:
This case reinforces the constitutional requirement for particularity in search warrants as stipulated under Article III, Section 2 of the Philippine Constitution, affirming that searches must strictly adhere to the description within the warrant. A search conducted in a locale not specified in the warrant is deemed unreasonable, and any evidence obtained is inadmissible in court.

Class Notes:
1. **Particularity Requirement**: Search warrants must specifically describe the place to be searched and items to be seized to avoid generalized searches and protect constitutional rights (Article III, Section 2, Philippine Constitution).

2. **Invalid Search Warrant**: Searches conducted in locations not mentioned in the warrant warrant suppression of the evidence obtained due to constitutional infringements.

3. **Procedural Posture**: Courts trying the criminal case involving evidence from an invalid search warrant can quash the warrant and suppress evidence.

4. **Certiorari**: The appropriate remedy for challenging lower court decisions in cases of grave abuse of discretion is emphasized against routine appeals when constitutional

violations occur.

Historical Background:
Historically, this case reflects ongoing judicial efforts to uphold constitutional safeguards against unreasonable searches and seizures. The decision aligns with jurisprudence emphasizing the need for precise adherence to procedural and constitutional standards in law enforcement activities, reflecting the Philippine judiciary’s broader commitment to civil liberties.