

Title: *Cariaga v. Sapigao and Acosta*

Facts:

The case began with Danilo Calivo Cariaga filing a Complaint Affidavit before the Office of the Provincial Prosecutor (OPP) in Urdaneta City, Pangasinan. He accused Emmanuel D. Sapigao and Ginalyn C. Acosta of Falsification of Public Documents, False Certification, and Slander by Deed under Articles 171, 174, and 359 of the RPC, respectively. Cariaga contended that in their roles as Barangay officials, the respondents made false entries in the barangay blotter suggesting unlawful activities on his property. These entries were allegedly based on unidentified reports and were used by the police to search Cariaga's residence and cattle farm, resulting in the confiscation of a firearm and ammunitions. Despite the subsequent dismissal of the illegal possession of firearms charge against Cariaga, he pursued the complaint, claiming defamation and discredit caused by the blotter entries.

Upon review, the OPP dismissed the complaint for lack of probable cause, citing the good faith of the respondents and their reliable witnesses. Cariaga's motion for reconsideration was denied, leading him to appeal to the Office of the Regional State Prosecutor (ORSP), which upheld the OPP's decision. The ORSP found no ill-motive in the blotter entries, supported by witness testimonies, and determined no probable cause for the crimes alleged by Cariaga.

Cariaga then escalated the matter to the CA, where his petition was dismissed on grounds of non-exhaustion of administrative remedies, more specifically, for not appealing the ORSP's decision to the Secretary of Justice (SOJ) as required. The CA upheld this dismissal even after Cariaga's motion for reconsideration, prompting him to file a petition for review with the Supreme Court.

Issues:

1. Whether the CA correctly dismissed Cariaga's petition for failing to exhaust administrative remedies by not appealing the adverse ORSP ruling to the SOJ.

Court's Decision:

The Supreme Court denied Cariaga's petition. It elucidated that based on the Department of Justice's rules regarding the appeals process within the National Prosecution Service, appeals from provincial or city prosecutors concerning complaints filed outside the NCR and involving crimes cognizable by lower courts should indeed be petitioned for review with the

ORSP. Additionally, determinations made by the ORSP in such cases are considered final unless revised by the SOJ in the interest of justice. The Court found that while the ORSP ruling regarding False Certification and Slander by Deed was final and beyond review by the SOJ, Cariaga's appeal to the CA concerning these crimes should have been entertained. Conversely, the ORSP's decision on Falsification of Public Documents required an appeal to the SOJ before judicial recourse was available. In conducting its review, the Court concluded that there was no probable cause to indict the respondents for the crimes in question, affirming the rulings of the lower prosecutorial bodies.

Doctrine:

The decision reiterates the doctrine of exhaustion of administrative remedies within the context of the National Prosecution Service's hierarchical appeal process, emphasizing the finality of ORSP's rulings in cases not filed in the NCR and involving offenses cognizable by lower courts, subject to oversight by the SOJ in the interest of justice.

Class Notes:

- The principle of exhaustion of administrative remedies necessitates that all hierarchical levels of administrative review be utilized before resorting to judicial intervention.
- The finality of decisions by the Office of the Regional State Prosecutor (ORSP) regarding crimes cognizable by lower courts (MTCs/MeTCs/MCTCs), unless reviewed by the Secretary of Justice in the interest of justice.
- Probable cause for the purpose of filing a criminal information exists when there is a well-founded belief that a crime has been committed and the accused is likely guilty thereof. It is based on opinion and reasonable belief, not on the certainty of guilt.

Historical Background:

The case reflects the procedural intricacies involved in the Philippine judicial and administrative prosecution system, specifically involving appeals within the prosecutorial hierarchy and the doctrine of exhaustion of administrative remedies. It underscores the nuanced approach required in evaluating administrative decisions before seeking relief from the courts, illustrating the balance between administrative autonomy and judicial oversight.