

Title:

Joel Bito-Onon vs. Hon. Judge Nelia Yap Fernandez and Elegio Quejano, Jr.: A Case on the Limits of DILG's Supervisory Authority Over Liga ng mga Barangay Elections

Facts:

Joel Bito-Onon, the elected Barangay Chairman of Tacras, Narra, Palawan, and Municipal Liga Chapter President of Narra, won the position of Executive Vice-President in the August 23, 1997, Liga ng Barangay Provincial Chapter election in Palawan against Elegio Quejano, Jr., who filled the same roles in Barangay Rizal, Magsaysay, Palawan. Quejano filed a post-proclamation protest with the Board of Election Supervisors (BES), which decided against him. Dissatisfied, Quejano sought a review of the BES's decision by filing a Petition for Review with the Regional Trial Court (RTC) of Palawan and Puerto Princesa City.

Bito-Onon moved to dismiss the petition, arguing the RTC lacked jurisdiction since the DILG Secretary's Memorandum Circular No. 97-193—providing for court review of BES decisions—was issued in excess of authority, constituting control rather than supervision over the Liga's internal organization. The RTC denied the dismissal, basing its jurisdiction on DILG's rule-making power under the Administrative Code. Bito-Onon's subsequent motion for reconsideration was also denied, leading to this petition.

Issues:

1. Whether Memorandum Circular 97-193 by the DILG Secretary was issued in excess of his authority.
2. Whether the respondent judge committed grave abuse of discretion in denying the motion to dismiss based on the questioned orders.

Court's Decision:

The Supreme Court granted Bito-Onon's petition, reversing the RTC's order and dismissing Quejano's Petition for Review. The Court found that the DILG Secretary's Memorandum Circular No. 97-193, permitting court reviews of BES decisions, went beyond supervision into control. This act amended and modified the guidelines promulgated by the National Liga Board, which is beyond the scope of the DILG's supervisory powers as defined by law. Consequently, the RTC was deemed to have committed grave abuse of discretion for not dismissing the Petition for Review due to a failure to exhaust all administrative remedies and lack of jurisdiction.

Doctrine:

The decision reiterates the doctrine distinguishing between the power of “supervision” and “control” over local government units and associated organizations. It underscores that while the Department of Interior and Local Government (DILG) has the authority to supervise and issue guidelines, such power does not extend to altering or amending the internal rules and procedures established by autonomous bodies like the Liga ng mga Barangay, emphasizing the autonomy of local organizations.

Class Notes:

- **Supervision vs. Control:** Supervision is overseeing or ensuring that subordinate bodies perform their duties according to legal or statutory requirements without interference on how those duties are executed. In contrast, control allows an entity to direct how another body accomplishes its responsibilities, including changing or dictating the methods of execution.
- **Local Government Autonomy:** Local government units (LGUs) and associated organizations such as the Liga ng mga Barangay enjoy a certain level of autonomy in their operations and governance. Although the DILG has a supervisory role, this does not include the authority to alter internal processes or rules established by these bodies.
- **Legal Remedies and Jurisdiction:** The decision also highlights the importance of exhausting administrative remedies before seeking judicial review and affirms that judicial bodies must ascertain their jurisdiction, especially in cases involving administrative decisions.

Historical Background:

This case illustrates the complex interaction between national oversight and local autonomy in the Philippines, a recurrent theme in the country’s legal and administrative history. The Liga ng mga Barangay, as a nationwide organization representing barangay (village) units, plays a critical role in local governance. The case puts into relief the limitations of national oversight, specifically the DILG’s supervisory role over local entities, underlining the autonomy provided to local government units and their associated organizations under the 1987 Philippine Constitution and the Local Government Code of 1991.