

**\*\*Title:** Governor Felicisimo T. San Luis et al. vs. Court of Appeals and Mariano L. Berroya, Jr.**\*\***

**\*\*Facts:\*\***

Mariano L. Berroya, Jr., serving as Quarry Superintendent in Laguna since 1959, exposed graft and corrupt practices within the provincial government in April and May 1973. Following his allegations, a chain of retaliatory administrative actions unfolded:

- In July 1973, Berroya was transferred to the office of the Provincial Engineer, citing LOI 14-B.
- The Civil Service Commission (CSC) declared the transfer in violation of Section 32, RA 2260 in October and ordered Berroya's reversion to his original post.
- Ignoring the CSC order, the Provincial Governor suspended Berroya in December 1973 for alleged misconduct.
- The CSC, in February 1974, reiterated Berroya's reinstatement and declared his suspension illegal.
- Appeals were made to the Office of the President, resulting in a series of reversals and re-affirmations of CSC's orders through 1974 to 1976.
- In 1977, Berroya was dismissed on multiple charges. He appealed to the CSC, which in January 1979 cleared him of charges and ordered his reinstatement.
- The Provincial Governor attempted to overturn this decision through several motions and petitions, all of which were eventually denied.
- Berroya filed a civil case for mandamus in the Regional Trial Court (RTC) and after its decision, appealed to the Court of Appeals (CA) which favored him, ordering his reinstatement and compensation for lost wages and moral damages.

**\*\*Issues:\*\***

The core legal issues addressed by the Supreme Court included:

1. The validity of Berroya's transfer and subsequent dismissal.
2. The applicability and interpretation of relevant Civil Service laws and administrative orders.
3. The finality and enforceability of administrative decisions by the CSC and the Office of the President.
4. The award of back wages, damages, and attorney's fees to Berroya.

**\*\*Court's Decision:\*\***

The Supreme Court upheld the appellate court's decision ordering Berroya's reinstatement but modified the decision in terms of the award of back wages due to Berroya's retirement.

It found that:

- Berroya's transfer, suspension, and dismissal were without just cause, improperly executed, and in violation of his rights.
- The decisions of the CSC and the Office of the President were final and binding, making Berroya entitled to reinstatement and back wages.
- The Provincial Governor's actions were in bad faith, thereby holding him personally liable for moral damages and attorney's fees.

**\*\*Doctrine:\*\***

The case reaffirmed the principle that decisions and orders of administrative agencies, rendered pursuant to their quasi-judicial authority, have the force and effect of a final judgment within the domain of res judicata. It emphasized the finality and binding effect of administrative decisions once they become executory.

**\*\*Class Notes:\*\***

- Res Judicata applies to the decisions of administrative agencies as well as courts.
- Administrative findings are accorded finality if supported by substantial evidence.
- A writ of mandamus lies to compel the performance of a ministerial duty enjoined by law.
- Public officials can be held personally liable for acts done in bad faith or beyond the scope of their duties.

**\*\*Historical Background:\*\***

This case sheds light on the challenges and repercussions faced by whistleblowers within the Philippine government system during the 1970s and underscores the lengths to which some officials would go to silence dissent or accountability efforts. It also exemplifies the judiciary's role in upholding the rule of law and protecting the rights of individuals against wrongful administrative action.