

Title:

Civil Service Commission vs. Hilario J. Dampilag: A Case of Examination Impersonation and Misrepresentation

Facts:

On November 27, 2014, the Civil Service Commission-Cordillera Administrative Region (CSC-CAR) received an anonymous complaint alleging that Hilario J. Dampilag committed an examination irregularity. Upon review, glaring disparities were noticed between Dampilag's facial features and signatures in the Picture Seat Plan (PSP) for the December 1, 1996 Career Service Professional Examination (CSPE) and his Personal Data Sheet (PDS) dated March 3, 1999. Subsequently, Dampilag was charged with Serious Dishonesty, Falsification of Official Documents, and Grave Misconduct.

Dampilag admitted in his defense that the photograph in the PSP was not of him but his former board mate. He claimed submitting the wrong photo was due to inadvertence and asserted the signatures had notable similarities, dismissing differences due to the time lapse since the exam.

The CSC-CAR found Dampilag guilty, a decision initially affirmed by the CSC but with a modification on the charges to two counts of serious dishonesty. Dampilag's appeal to the Court of Appeals (CA) resulted in exoneration based on a lack of substantial evidence presented to support the CSC's findings. Subsequently, the CSC, via the Office of the Solicitor General (OSG), petitioned for review on certiorari before the Supreme Court.

Issues:

1. Whether the CA erred in exonerating Dampilag despite CSC's assertion that discrepancies in Dampilag's signatures and photographic identification were substantially evidenced.
2. Whether administrative agencies' findings on factual matters, supported by substantial evidence, are controlling upon reviewing courts.
3. Whether Dampilag's act of submitting a wrong photograph during an examination constitutes 'excusable negligence'.

Court's Decision:

The Court ruled in favor of the CSC, noting that findings of administrative agencies are controlling on reviewing courts if based on substantial evidence, barring exceptions. The Court criticized the CA's reliance on the absence of direct evidence (PSP and PDS

documents) in the record as a basis for exoneration rather than on the substantial evidence standard applicable in administrative cases.

It highlighted the improbability of inadvertence in submitting a wrong photograph and emphasized the presumption of regularity in the performance of CSC examiners' duties. Through comparative signature analysis, despite the absence of handwriting expert testimonials, the Court found evident disparities sufficient to conclude impersonation had occurred, thereby substantiating the charges against Dampilag.

Therefore, Dampilag was found guilty of two counts of serious dishonesty, falsification of official documents, and grave misconduct, based on his impersonation during the CSPE and misrepresentation in the PDS.

Doctrine:

1. Administrative agencies' findings, if supported by substantial evidence, are generally binding on reviewing courts.
2. In administrative cases, the quantum of evidence required for a finding of guilt is substantial evidence.
3. The presumption of regularity in the performance of official duties stands in the absence of strong evidence to the contrary.

Class Notes:

- **Serious Dishonesty**: Concealment or distortion of truth relevant to one's duty.
- **Substantial Evidence**: Such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
- **Presumption of Regularity**: Officials are presumed to have performed their duties properly unless proven otherwise.
- **Impersonation in Examinations**: Employing another person to take an examination on one's behalf constitutes serious dishonesty and falsification of official documents.

Historical Background:

This case underscores the judicial perspective on examination integrity within the Philippine civil service system, illustrating the strict adherence to principles of honesty and the importance of upholding the credibility of civil service examinations. It also highlights the procedural journey of administrative cases in the Philippines, from the CSC, through the CA, and ultimately to the Supreme Court.