

****Title:**** *People of the Philippines vs. Jesus A. Arrojado: The MCLE Compliance Case*

****Facts:****

Jesus A. Arrojado was charged with murder by the Office of the City Prosecutor of Roxas City, Capiz, resulting in Criminal Case No. C-75-09, which was assigned to Branch 16 of the Regional Trial Court (RTC) of Roxas City, Iloilo. Arrojado filed a Motion to Dismiss based on the prosecutor's failure to indicate her Mandatory Continuing Legal Education (MCLE) Certificate of Compliance number and issue date on the Information, as required by Bar Matter No. 1922. The RTC dismissed the charge without prejudice. The prosecution's Motion for Reconsideration was denied, leading to a petition for certiorari and/or mandamus with the Court of Appeals (CA). The CA affirmed the RTC's Orders. The People, represented by the Office of the City Prosecutor, filed a petition for review on certiorari with the Supreme Court, challenging the CA ruling.

****Issues:****

1. Whether the term "pleadings" in Bar Matter No. 1922 includes criminal Informations.
2. Whether the failure to indicate the MCLE compliance details in the Information constitutes grounds for its dismissal.

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

The Supreme Court denied the petition, affirming the CA and RTC decisions. The Court clarified that an Information is a pleading as it constitutes a written statement of claims (the charge against the accused) akin to a complaint in civil suits. As a result, it falls within the ambit of Bar Matter No. 1922, which requires practitioners to indicate their MCLE compliance on all pleadings, the failure of which leads to case dismissal. The Court further stated that the trial court acted within its discretion, adhering to mandatory procedural rules, and thus there was no abuse of discretion warranting certiorari. The ample remedy was to re-file the Information with the necessary MCLE details instead of contesting the procedural omission.

****Doctrine:****

This case reaffirmed the necessity for practicing lawyers in the Philippines to comply with the Continuing Legal Education requirements and to indicate such compliance in all pleadings filed in courts or quasi-judicial bodies, as mandated by Bar Matter No. 1922. Failure to comply results in case dismissal and expunction of pleadings from the record.

****Class Notes:****

- **Bar Matter No. 1922:** Requires MCLE Certificate of Compliance or Certificate of Exemption details on all pleadings.
- **Pleadings:** Include written claims and defenses, such as complaints, answers, and information.
- **Information in Criminal Cases:** Is considered a pleading and must adhere to MCLE requirements.
- **Judicial Remedies:** A petition for certiorari addresses errors involving jurisdiction or grave abuse of discretion, not mere procedural oversights.
- **Amendment to BM No. 1922 (January 14, 2014):** Failure to indicate MCLE compliance results in a penalty or disciplinary action, not case dismissal.

Historical Background:

This case highlights the Philippine legal system's emphasis on continuing legal education and its impact on the procedural aspects of both civil and criminal litigation. The requirement to specify MCLE compliance aimed to ensure the legal profession's integrity and competence. However, its strict enforcement, as seen in this case, led to significant legal debates about procedural dismissals affecting substantive justice. The eventual amendment reflects a shift towards penalizing non-compliance without necessarily impacting the progress of cases, balancing procedural strictness with practical considerations in legal proceedings.