

****Title:**** Roberto Ocampo vs. Fernando Buenaventura, et al.

****Facts:**** Roberto Ocampo filed a petition for certiorari and prohibition against Fernando Buenaventura and other Cebu Police Department members, along with Judge Mateo Canonoy, challenging their actions related to a civil case filed against him (Civil Case No. R-11320). The root of this legal controversy began on September 11, 1966, when Cebu police arrested Ocampo's son and nephews for allegedly violating a curfew ordinance. Although initially convicted, the minors were acquitted on appeal by Judge Tantuico, who found the arrest unjust due to an exemption in the ordinance.

Subsequently, Roberto Ocampo filed a complaint against the involved policemen for misconduct and abuse of authority, which led to their exoneration by the Mayor's Administrative Order No. 157 and spurred ongoing proceedings before the Police Commission (POLCOM). In response, the policemen sued Ocampo for damages in June 1969. Ocampo's motion to dismiss the civil suit on the grounds of the existence of a prejudicial question and prematurity was denied by the Cebu Court, leading to the present petition.

****Issues:****

1. Whether the court a quo committed an abuse of discretion in denying Ocampo's motion to dismiss and/or suspend the civil suit for damages.
2. Whether the suit for damages filed by the policemen was premature pending the resolution of the administrative case against them by the POLCOM.
3. Whether the doctrine of res judicata applies in dismissing the POLCOM case due to the Mayor's prior exoneration of the policemen.

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

The Supreme Court ruled in favor of Roberto Ocampo. It found that there was no prejudicial question as required by law since the POLCOM case was administrative and not criminal. The Court determined the civil suit for damages to be premature - it could not proceed until the POLCOM's administrative case was resolved. This was because the allegations in the damages suit were directly connected to the outcome of the administrative case. Moreover, the Supreme Court dismissed the respondents' argument of res judicata, explaining that the Mayor lacked jurisdiction to conclusively decide on the administrative matters concerning police conduct, which were under the purview of POLCOM.

****Doctrine:****

- The Court clarified that a prejudicial question must precede a criminal prosecution and does not apply in strictly administrative or civil contexts.
- It also reiterated that civil actions must not proceed when their resolutions are contingent on unresolved administrative proceedings, emphasizing the prematurity of such suits.
- The Court elaborated on the inapplicability of res judicata in administrative cases not within the adjudicative jurisdiction of the authority that rendered the initial decision, in this case, the City Mayor as opposed to POLCOM.

****Class Notes:****

- ****Prejudicial Question:**** Requires that a previously unresolved question must have a direct bearing on a criminal case, not applicable between administrative and civil cases.
- ****Prematurity of Civil Suits:**** Civil suits based on outcomes of pending administrative actions are considered premature and should be suspended until the administrative matter's resolution.
- ****Res Judicata in Administrative Cases:**** For res judicata to apply, the earlier decision must be within the jurisdiction of a competent authority and meet specific criteria, including final judgment on the merits and identity of parties, subject matter, and cause of action. Administrative decisions by an authority lacking jurisdiction (e.g., City Mayor instead of POLCOM) do not bar subsequent administrative or legal actions.

****Historical Background:****

This case reflects the intricacies of Philippine administrative and police law, highlighting the procedural limitations in pursuing civil damages during ongoing administrative investigations. It underscores the jurisdictional boundaries between administrative bodies like POLCOM and local government officials, as shaped by legislative changes and judicial interpretations over time.