

Title:

National Organization of Laborers & Employees (NOLE) vs. Arsenio Roldan et al.

Facts:

The case concerns the National Organization of Laborers & Employees (NOLE) and two of its members, Tarcib Rivas (President) and Alberto Tolentino, against the Rizal Cement Co., Inc. and the Judges of the Court of Industrial Relations (CIR). The controversy arose from a strike initiated by over 200 employees of Rizal Cement Co., most of whom were NOLE members, on March 12, 1952, due to unmet demands for salary increases, vacation leave, and accrued leave with pay. The strike led to a temporary resolution on March 20, 1952, granting the strikers a 7% wage increase and additional leaves, except for Rivas and Tolentino, who were excluded for being charged with illegal possession of hand grenades.

Following their acquittal in July 1952, NOLE filed a motion for their reinstatement with backpay, opposed by the cement company. The CIR reviewed the joint cases and, despite the criminal court's acquittal, independently determined that Rivas and Tolentino were rightfully not reinstated due to their connection to the hand grenades found, believed to be intended for sabotage of the company's property.

Issues:

1. Whether the CIR erred in conducting its own investigation and making findings independent of the criminal court's acquittal of Rivas and Tolentino.
2. Whether the CIR's determination of the legality of the strike was correct and justified.

Court's Decision:

The Supreme Court upheld the CIR's decisions, affirming the difference between criminal liability and civil or non-criminal liability. It ruled that the CIR had the authority to conduct its own hearings and make findings that could affect employment relations independently of criminal proceedings where guilt must be proven beyond reasonable doubt. The Court also indicated that, since concessions were granted to the striking workers and the controversy seemed to center only around Rivas and Tolentino, it deemed the wider legality of the strike moot.

Doctrine:

The Supreme Court reiterated the principle that an employee's acquittal in a criminal case does not bar an employer or judicial authority like the CIR from making an independent evaluation of the facts that may affect employment relations. The adjudication in civil

liabilities, including employment disputes, requires merely a preponderance of evidence, not proof beyond a reasonable doubt.

Class Notes:

- Distinction between criminal liability and civil or employment-related liability: Criminal liability requires proof beyond reasonable doubt, while civil or employment disputes require a preponderance of evidence.
- An acquittal in a criminal case does not prevent employers or judicial bodies from determining an employee's suitability for reinstatement based on an independent evaluation of the facts related to employment standards.
- Strikes aimed at causing destruction of property or employing unlawful means to maintain them are considered illegal.

Historical Background:

The case underscores the complex interplay between labor rights, industrial actions like strikes, and the legal boundaries defining permissible activities during labor disputes. It highlights the Philippine judiciary's role in mediating such conflicts, emphasizing the distinction between criminal proceedings and the adjudication of employment disputes.