

****Title:**** Office of the President and Presidential Anti-Graft Commission vs. Calixto R. Cataquiz

****Facts:****

Calixto R. Cataquiz, was appointed General Manager of the Laguna Lake Development Authority (LLDA) on April 16, 2001. On April 1, 2003, allegations of corrupt and unprofessional conduct were raised against Cataquiz by LLDA's rank-and-file employees. This prompted Secretary Gozun of the DENR to commission an investigating team, which found potential guilt in Cataquiz for acts prejudicial to government interest. Consequently, the case was forwarded to the Presidential Anti-Graft Commission (PAGC) for investigation.

Upon review, PAGC recommended Cataquiz's dismissal, leading to his replacement on December 8, 2003. The Office of the President, adopting PAGC's findings, formally dismissed Cataquiz from service. Cataquiz appealed for reconsideration, leading the Office of the President to issue an Amended Resolution imposing disqualification from government re-employment and forfeiture of retirement benefits instead. Cataquiz escalated the matter to the CA, which overturned the Office of the President's decisions.

****Issues:****

1. Whether the CA erred in its factual determinations leading to the reversal of the Office of the President and PAGC's findings.
2. The applicability of the dismissal of charges by the Ombudsman to the administrative case.
3. The imposition of accessory penalties to Cataquiz despite his earlier dismissal from service.
4. The validity of charging Cataquiz with violation of Board Resolution No. 28 in light of a clerical error citing Board Resolution No. 68.

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

The Supreme Court found merit in the petition, restoring the original decision of the Office of the President. It ruled that the CA improperly disregarded the factual findings and recommendations by both the DENR investigating team and the PAGC. Furthermore, the dismissal of criminal charges by the Ombudsman lacked relevance to the administrative liabilities discussed. The Court reiterated that the imposition of accessory penalties remained valid irrespective of Cataquiz's prior removal from service. Additionally, the clerical mistake regarding the Board Resolution number was deemed rectifiable, with the actions taken against Cataquiz considered to be within the bounds of legality.

****Doctrine:****

The decision established that administrative, criminal, and civil liabilities are distinct and can be pursued independently. It also confirmed that procedural errors, such as typographical mistakes in legal documents, do not nullify the essence of the charges if the involved party had the full ability to respond to the allegations, safeguarding the principles of due process.

****Class Notes:****

- ****Administrative vs. Criminal Liabilities:**** Public officers can face different forms of liability (administrative, criminal, and civil) independently for the same act.
- ****Accessory Penalties:**** These can still be imposed even if a primary penalty (e.g., dismissal) becomes moot due to prior developments like resignation or removal.
- ****Clerical Errors in Legal Documents:**** Such errors do not invalidate the proceedings if they do not affect the substantial rights of the accused, and correction is possible to align with the true intent of the document.
- ****Legal Doctrines and Statutes Cited:**** The decision applies the principle that the Supreme Court will not set aside the factual findings of administrative bodies and lower courts except in certain conditions. It underscores substantial evidence as essential for administrative liability and the independence of different types of liabilities.

****Historical Background:****

This case highlights the administrative accountability mechanisms within the Philippine government framework, particularly concerning high-ranking officials in government-owned and controlled corporations. The actions taken against Cataquiz reflect the intricate process of checks and balances aimed at maintaining integrity and professionalism in the public service.