

Title: Saludo, Jr. v. American Express International, Inc., et al.

Facts:

Aniceto G. Saludo, Jr., a Filipino citizen, member of the House of Representatives, and a resident of Ichon, Macrohon, Southern Leyte, filed a complaint for damages against American Express International, Inc. (AMEX) and its officers Ian T. Fish and Dominic Mascrinas in the Regional Trial Court (RTC) of Maasin City, Southern Leyte, Branch 25. The complaint stemmed from the alleged wrongful dishonor of Saludo's AMEX credit card and a supplementary card issued to his daughter in the United States and Japan, respectively. The dishonor, according to Saludo, was based on AMEX's unilateral suspension of his account for a claimed failure to pay the balance for March 2000, which Saludo contested. He claimed this act led to great inconvenience and damage to his reputation.

AMEX and its officers filed an answer, denying the allegations and asserting a lack of cause of action and improper venue, arguing that none of the parties were residents of Leyte. They also highlighted Saludo's Community Tax Certificate issued in Pasay City as evidence of his non-residency in Leyte. Saludo refuted the improper venue defense by insisting on his residency in Southern Leyte, supported by his position as a congressman for the area.

The RTC denied AMEX's defense of improper venue and affirmed Saludo's residency in Southern Leyte. AMEX sought reconsideration, which the RTC denied. Consequently, AMEX filed a petition for certiorari and prohibition with the Court of Appeals, leading to a ruling in favor of AMEX, directing the RTC to dismiss Saludo's complaint on grounds of improperly laid venue. Saludo's motion for reconsideration was denied, leading to the filing of a petition for review with the Supreme Court.

Issues:

1. Whether the Court of Appeals erred in not recognizing Saludo's residency in Southern Leyte for purposes of venue.
2. Whether the Court of Appeals erred in its interpretation and application of the rules of venue in dismissing Saludo's complaint.
3. Whether Saludo engaged in improper venue selection to inconvenience the respondents or gain unfair advantage.

Court's Decision:

The Supreme Court granted Saludo's petition, reversing the Court of Appeals' decision. It held that for election law purposes, Saludo's residency in Southern Leyte was significant,

making him eligible to file the complaint in the said jurisdiction. The Court distinguished between “domicile” and “residence,” emphasizing that Saludo, as a congressman, must have a domicile in Southern Leyte, making it his residence for venue purposes. The Supreme Court clarified that a party could have several residences for different purposes. Importantly, the Court underscored the non-equivalence of a Community Tax Certificate’s issuance place with a person’s residence for legal proceedings. It reinstated the RTC’s orders that initially recognized the proper venue as Southern Leyte, effectively allowing Saludo’s complaint to proceed.

Doctrine:

1. Domicile vs. Residence: The Supreme Court reaffirmed the distinction between “domicile” (a more permanent abode) and “residence” (a temporary place of abode) and applied the less technical definition of “residence” for venue purposes, emphasizing physical presence and intent to return.
2. Judicial Notice of Residency for Elected Officials: Courts can take judicial notice of facts that are of public knowledge, such as the residency of an elected congressman in the district they represent, without the requirement of evidence.

Class Notes:

- For determining the proper venue in personal actions, the plaintiff has the option to choose the venue based on either party’s residence, which includes both domicile and physical residence.
- A person can have multiple residences for different legal purposes but only one domicile.
- The issuance place of a Community Tax Certificate does not conclusively determine a person’s residence for legal proceedings.
- Courts can take judicial notice of an elected official’s residency in the district they serve, given its public interest and relevance.

Historical Background:

This case underscores the evolving legal interpretation of “residence” in Philippine jurisdiction, especially concerning election law and procedural matters like venue determination. It highlights the judiciary’s role in clarifying legal concepts that intersect public service, personal status, and procedural laws, ensuring that justice administration accounts for both technical legal standards and practical life scenarios.