

### Taruc et al. vs. Bishop De La Cruz et al.

**\*\*Facts:\*\***

The case originated from internal conflicts within the Philippine Independent Church (PIC) in Socorro, Surigao del Norte. Petitioners, who were lay members of the church, contested the leadership and conduct of Fr. Rustom Florano and appealed for his transfer, citing political and personal animosities. Their requests were denied by Bishop Porfirio de la Cruz, leading to heightened tensions in the congregation.

In an act of defiance, the petitioners organized an open mass led by Fr. Renato Z. Ambong, not recognized by the church's authority, thereby escalating the dispute. This act resulted in Bishop de la Cruz expelling the petitioners from the church for disobedience, causing dissension, and threatening to forcibly occupy the church.

The petitioners appealed to the higher church authority, the Obispo Maximo, who suggested a voluntary step down by Fr. Florano to ease tensions but did not intervene in the expulsion decision. Despite leadership changes (Bishop Timbang taking over from Bishop de la Cruz), the petitioners' grievances remained unaddressed, culminating in the filing of a civil case for damages and a preliminary injunction against Bishop de la Cruz, Fr. Florano, and Delfin T. Bordas for conspiracy in the expulsion.

The Regional Trial Court of Surigao City initially handled the case but was contested on jurisdiction grounds, leading to an appeal in the Court of Appeals, which reversed the lower court's decision, citing the matter as ecclesiastical and outside the purview of civil courts. This decision was appealed to the Supreme Court by the petitioners.

**\*\*Issues:\*\***

1. Whether civil courts have jurisdiction over disputes involving the expulsion or excommunication of members from a religious institution.

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

The Supreme Court affirmed the decision of the Court of Appeals, holding that the expulsion/excommunication of members from a religious organization falls under ecclesiastical matters, which are beyond the scope of civil court jurisdiction. The court underscored the constitutional principle of the separation of church and state and emphasized that internal church disputes should be resolved within the ecclesiastical order

as per the organization's laws and canons. The Court noted the petitioners had been given due warnings before their expulsion and thus found no merit in the petition.

**\*\*Doctrine:\*\***

This case reaffirms the principle that civil courts do not interfere with ecclesiastical decisions involving religious institutions. The jurisdiction of civil courts is limited to disputes concerning civil or property rights, excluding doctrinal or disciplinary issues, which are considered ecclesiastical matters.

**\*\*Class Notes:\*\***

- **\*\*Separation of Church and State\*\***: Highlighting the constitutional underpinning that prevents civil courts from adjudicating internal religious disputes.
- **\*\*Ecclesiastical Jurisdiction\*\***: Doctrine that religious institutions have the autonomy to govern their internal affairs, including membership decisions, without civil court intervention.
- **\*\*Civil vs. Ecclesiastical Matters\*\***: Distinction that civil rights or property disputes involving churches may be adjudicated by civil courts, while doctrinal or disciplinary matters are not within their jurisdiction.

**\*\*Historical Background:\*\***

This case illustrates the challenges and complexities arising from the intersection of religious autonomy and civil law. It situates within a broader jurisprudential tradition that respects the constitutional separation between church and state, emphasizing that internal church disputes, especially those concerning doctrine or discipline, are to be resolved internally according to the church's established procedures. This principle is essential in maintaining the delicate balance between protecting individual rights and respecting the independence of religious institutions from state interference.