

Title: **\*\*Ante vs. University of the Philippines (UP) Student Disciplinary Tribunal\*\***

Facts:

Ariel Paolo A. Ante, along with Marcelino G. Veloso III, Keefe Dela Cruz, and Armand Lorenze V. Sapitan, faced disciplinary actions from the University of the Philippines (UP) over their alleged involvement in hazing activities related to the death of Chris Anthony Mendez. Ante contested the proceedings, asserting a breach of due process for failure to conduct a valid preliminary inquiry as per UP's governing rules for fraternities, sororities, and student organizations. Despite these contentions, the Student Disciplinary Tribunal (SDT) proceeded with the charges, leading Ante to file an omnibus motion which was denied. Ante then filed a petition for certiorari and prohibition before the Regional Trial Court (RTC) of Quezon City, which initially ruled in his favor, nullifying the SDT's proceedings. This decision was later reversed by the Court of Appeals, prompting Ante to seek review by the Supreme Court.

Issues:

1. Whether the preliminary inquiry conducted by SDT was valid.
2. Whether SDT's actions constituted prejudgment violating Ante's right to due process.

Court's Decision:

The Supreme Court dismissed Ante's petition, affirming the Court of Appeals decision. It found that:

1. The preliminary inquiry by the SDT was valid. The Court clarified that the inquiry facilitated "by" any SDT member did not necessitate exclusion of others' participation, like the University Prosecutor, in the process.
2. There was no violation of due process or prejudgment by the SDT, maintaining the presumption of innocence until the formal hearing concluded.

Doctrine:

The decision underscored the principle that procedural devices should not be employed to unduly delay proceedings where substantial matters can be resolved. It also reaffirmed the lenient application of procedural rules in student disciplinary settings, insisting on basic fairness rather than strict adherence to judicial standards.

Class Notes:

- Due Process in Academic Disciplinary Actions: Students must be informed of charges, given the opportunity to respond, informed of evidence against them, allowed to present

their own evidence, and have their evidence considered.

- Preliminary Inquiry: A preliminary inquiry's validity isn't negated by participation from entities like the University Prosecutor as long as it remains under the oversight or involvement of the appropriate disciplinary tribunal members.
- Interpretation of Procedural Texts: Terms like "by" and "before" should not always be interpreted strictly when used in procedural contexts, especially if such interpretation would lead to absurd results or hinder the pursuit of justice.
- Motion for Reconsideration: Not always a prerequisite for certiorari if the rules expressly prohibit it or if it would be evidently futile.

#### Historical Background:

This case illustrates the evolving application of procedural fairness within academic institutions, balancing the need for disciplinary processes with the rights of students to due process. It showcases the judiciary's discretionary power in interpreting institutional rules against the backdrop of overarching legal principles such as due process and right to a fair trial.