Title: Taisei Shimizu Joint Venture v. Commission on Audit and The Department of Transportation

Facts:
Taisei Shimizu Joint Venture (TSJV), a joint venture between two Japanese corporations, won the contract for the construction of the New Iloilo Airport and entered into an agreement with the Department of Transportation (DOTr, formerly DOTC) on March 15, 2004. Post-completion, certain billings remained unpaid, leading TSJV to file a Request for Arbitration and Complaint with the Construction Industry Arbitration Commission (CIAC), seeking payment for various claims amounting to Php2,316,687,603.03.

Despite reductions in the claimed amounts through the arbitration process and a final and executory CIAC Award directing the DOTr to pay a certain amount, the DOTr opposed the motion for execution on the basis of the public nature of the funds. Subsequently, upon TSJV's pursuit of execution, it was directed towards the Commission on Audit (COA) for approval as a prerequisite for payment. The COA, claiming jurisdiction over the matter, partially approved the payment but disapproved significant portions of the award, leading to TSJV filing a motion for reconsideration which was eventually denied.

Issues:
1. Whether the COA has exclusive jurisdiction over money claims due from or owing to the government.
2. Whether the COA, in exercising its audit power, can disturb the final and executory decisions of courts, tribunals, or other adjudicative bodies.

Court's Decision:
The Supreme Court clarified that the COA's jurisdiction over money claims does not preclude the exercise of jurisdiction by other adjudicatory bodies over the same subject matter. The Court stipulated that once a court or other adjudicative body renders a final and executory judgment over a money claim involving the State, such judgment is binding and conclusive, effectively limiting the COA's audit review to ensuring lawful disbursement of funds for the satisfaction of the judgment, rather than re-evaluating the merits of the case.

Doctrine:
1. The principle of immutability of final judgments asserts that once a judgment becomes final and executory, it cannot be disturbed or modified except under very limited circumstances.

2. The COA’s jurisdiction over money claims against the government is not exclusive and does not extend to disturbing final and executory decisions of other adjudicative bodies.

Class Notes:
– **Finality of Judgment:** Once a judgment is rendered by a competent authority and becomes final and executory, it cannot be altered or challenged except under specific exceptions.
– Relevant legal statute: Article IX of the 1987 Philippine Constitution.
– **COA Jurisdiction:** The COA has the authority to examine, audit, and settle all accounts related to government expenditure but does not have exclusive jurisdiction over money claims nor the ability to modify final judgments.
– Relevant legal statutes: Presidential Decree No. 1445 (Government Auditing Code of the Philippines) and the 2009 Revised Rules of Procedure of the Commission on Audit.
– **Separation of Powers:** The role of the COA in the context of final and executory judgments primarily pertains to the lawful enforcement of such judgments, without delving into the merits of the case itself.

Historical Background:
This case underscores the intricate balance between the mandate of the COA to audit and review government expenditures and the principle of finality of judgments within the Philippine legal system. It highlights the need for careful delineation of authority among various branches and instrumentalities of the government, ensuring that the principles of justice and fairness are upheld without unduly encroaching on the functions and responsibilities of each entity.