

Title:

****Atty. David B. Corpuz vs. Court of Appeals and MTRCB****

Facts:

- ****18 July 1986****: Atty. David B. Corpuz (CORPUZ) was appointed as MTRCB's Legal Counsel — Prosecutor and Investigation Services (Supervising Legal Staff Officer). The appointment was approved by CSC-National Capital Region.
- CORPUZ' duties included attending Board meetings as per Chairman Morato's memorandum dated ****11 September 1987****.
- ****1 August 1991****: MTRCB passed undated Resolution No. 8-1-91, declaring all current administrative and subordinate appointments as "null and void" due to procedural irregularities.
- ****12 March 1993****: The resolution contents were publicly disclosed.
- ****19 January 1993****: Resolution No. 8-1-91 was confirmed with the creation of an Ad Hoc Committee to review old appointments.
- ****28 June 1993****: MTRCB disapproved CORPUZ' appointment effective ****30 June 1993****.
- ****27 July 1993****: CORPUZ filed a complaint with the CSC.
- ****31 August 1993****: CSC granted MTRCB authority to fill positions affected by invalid appointments.
- ****23 December 1993****: CSC ruled in favor of CORPUZ, reinstating him with back salaries.
- ****20 June 1994****: CSC denied MTRCB's motion for reconsideration.
- ****22 August 1994****: CORPUZ started his permanent employment with the Ombudsman.
- MTRCB petitioned to the Supreme Court, which referred it to the Court of Appeals.
- ****13 October 1995****: Court of Appeals ruled against CORPUZ, annulling CSC's resolution.

Issues:

1. ****Validity of CORPUZ's Appointment****: Whether CORPUZ's appointment as Attorney V was valid under applicable laws.
2. ****Security of Tenure****: Whether CORPUZ acquired security of tenure despite the appointment's claimed procedural defects.

Court's Decision:

1. ****Validity of Appointment****:
 - Under ****P.D. 1986****, MTRCB personnel appointments required both recommendation by the Chairman and approval by the Board.
 - CORPUZ's appointment lacked MTRCB Board's approval, rendering it incomplete and invalid.

- Precedent cases (Tomali v. CSC, Favis v. Rupisan) reinforced the requirement of legal compliances for valid appointments.

2. **Security of Tenure**:

- Security of tenure applies only to valid, completed appointments.
- CORPUZ, without MTRCB's approval, was a de facto officer without vested rights or job security.
- The Court affirmed the Court of Appeals' decision, as CORPUZ's position had never been fully validated.

Doctrine:

1. **Necessity of Complete Approval for Valid Appointments**: An appointment in civil service is only valid if all legal requirements, including necessary approvals, are fulfilled.
2. **Security of Tenure Requires Valid Appointment**: Only those who are validly appointed and possess the required approvals can claim security of tenure.

Class Notes:

1. **Appointment Process**:

- **Recommendation**: Initial step by appointing authority (Chairman for MTRCB).
- **Approval**: Final step requiring consent from another body (MTRCB Board).
- Legal Frameworks: P.D. 1986, R.A. 2260, and related rulings (Tomali, Favis).

2. **Public Officer's Tenure**:

- **De Facto Officer**: Occupies office without full legal right due to procedural defects.
- Security of Tenure: Ensured only by valid, completed appointment with all necessary approvals.

Historical Background:

- **P.D. No. 1986**: Established the MTRCB, defining its structure and procedural requirements.
- **1990s Administrative Reforms**: Focus on regularizing government employee appointments for transparency and accountability.
- This case amplifies the strict adherence to administrative laws for public office appointments to prevent arbitrary decisions and ensure governance integrity.

By emphasizing compliance with legal and procedural requirements for appointments in public office, this case highlights the significance of following the rule of law in administrative processes.