

****Title:****

Re: Failure of Various Employees to Register Their Time of Arrival and/or Departure from Office in the Chronolog Machine

****Facts:****

This administrative case originated from a report by the Leave Division of the Supreme Court, relayed to the Complaints and Investigation Division of the Office of Administrative Services (OAS). The report documented the failure of several Supreme Court employees to register their time of arrival and/or departure from the office using the Chronolog Time Recorder Machine (CTRM) for the first semester of 2005. The employees charged include:

1. Noemi B. Adriano
2. Dennis Russell D. Baldago
3. Edilberto A. Davis
4. Atty. Catherine Joy T. Comandante
5. Jonathan Riche G. Mozar
6. Mariles M. Sales
7. Virginia B. Ciudadano
8. Pia Claire C. Bernal
9. Teresita M. Aniñon
10. Honradez M. Sanchez
11. Samuel R. Ruñez, Jr.
12. Arturo G. Ramos
13. Zosimo D. Labro, Jr.
14. Leonarda Jazmin M. Sevilla
15. Ariel Conrad A. Azurin

They were directed to explain why no administrative action should be taken against them. The defendants provided various explanations such as defective IDs, malfunctioning CTRMs, and being on official business. Most notably:

- Adriano cited domestic/office concerns, travel time, forgetfulness, and CTRM malfunction.
- Baldago complained of external meetings, neglect, and defective ID.
- Davis claimed his ID was forgotten or left, doubting the accuracy of recorded dates.
- Comandante cited official business and forgetfulness.
- Mozar found it inconvenient to return to the office just for CTRM registration.

Upon the evaluations by the OAS, they concluded most employees' reasons were insufficient and cited past administrative cases of dishonesty as their basis for this conclusion. The OAS recommended stern warnings for the majority, a requirement to submit proper documentation for external meetings, and specific findings for Sevilla and Azurin, the latter being recommended for administrative liability for dishonesty.

****Issues:****

1. Whether the respondent employees are guilty of violating reasonable office rules and regulations.
2. Whether Leonarda Jazmin M. Sevilla violated reasonable office rules and regulations by maintaining two ID cards.
3. Whether Ariel Conrad A. Azurin's acts constituted dishonesty.

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

1. ****On Violation of Reasonable Office Rules and Regulations:****

- The Court affirmed the OAS findings that the respondents were guilty of violating the administrative regulations requiring adherence to the CTRM protocol. The explanations provided—such as personal reasons, defective IDs, forgetfulness, and malfunctioning machines—were deemed weak and inadequate to justify non-compliance.
- Under the Uniform Rules on Administrative Cases in the Civil Service, this infraction was classified as a light offense, warranting a stern warning against repetition for 14 of the 15 employees charged for their first violation.

2. ****On Leonarda Jazmin M. Sevilla:****

- Sevilla was found not guilty as her alternate use of two IDs, while confusing, did not breach any specific office rule as noted by the OAS. Verification of her daily time records showed consistent and punctual attendance. However, she was advised to cease using the old ID to avoid future confusion.

3. ****On Ariel Conrad A. Azurin:****

- Azurin was found guilty of dishonesty for intentionally not registering in the CTRM to cover habitual tardiness, compounded by errors in his submitted RATs. Despite previous suspensions for habitual tardiness, he did not deny non-compliance, attributing it instead to CTRM or ID card issues. The Court reviewed these claims and observed a deliberate attempt to avoid being marked late, thus recommending suspension.

****Doctrine:****

- **Inherent Public Trust and Office Regulations:** Every court employee must adhere strictly to attendance protocols, reflecting public trust and efficient public service delivery. Any deviation undermines this trust and may warrant disciplinary actions.
- **Dishonesty in Public Service:** Deliberate deception in timekeeping and attendance records constitutes a serious administrative offense given that it involves public funds and trust. Repeat offenses by an employee heighten the severity of the penalties applicable under administrative law.

Class Notes:

- **Attestation to Public Funds:** Registering attendance via CTRM is an assertion to taxpayers of their entitlement and usage of public funds.
- **First Line of Defense:** Proper registration guards against attempts to defraud public services.
- **Common Defenses (Invalid):** Employees' justifications such as personal chores, traffic, and defective IDs are insufficient to excuse attendance violations.
- **Dishonesty Penalty:** Under Civil Service Law (CSC Memorandum Circular No. 19-99), dishonesty is met with dismissal, modifiable upon discretionary mitigating circumstances.

Historical Background:

The context surrounding this case revolves around enforcing stringent adherence to at-office attendance protocols within the Filipino government's judiciary system. The decisions undertaken exemplify some of the internal control enforcement measures in the post-2000 judicial administrative era, emphasizing accountability and transparency in public service performance and employee conduct.