

****Title:**** Republic of the Philippines, Represented by the Armed Forces of the Philippines Finance Center (AFPFC) vs. Daisy R. Yahon

****Facts:****

1. Daisy R. Yahon filed a petition for the issuance of a protection order against her husband, S/Sgt. Charles A. Yahon under R.A. No. 9262 (Anti-Violence Against Women and Their Children Act of 2004).
2. The couple married in June 2003. Daisy had a daughter from a previous relationship.
3. The petition cited verbal, emotional, and physical abuses, as well as economic deprivation.
4. On September 28, 2006, the RTC issued a Temporary Protection Order (TPO), enjoining S/Sgt. Yahon from further abuse and mandating financial support.
5. The TPO required S/Sgt. Yahon to maintain a distance of 500 meters from Daisy and provide reasonable financial support.
6. Daisy testified that S/Sgt. Yahon never complied with the court orders.
7. Despite being served, S/Sgt. Yahon failed to file an opposition or appear in subsequent hearings, prompting the RTC to move forward with an ex-parte presentation of evidence.
8. On July 23, 2007, the RTC issued a Permanent Protection Order (PPO) and ordered S/Sgt. Yahon to provide P4,000 monthly spousal support and 50% of his retirement benefits.
9. The AFP Finance Center (AFPFC) filed a motion to lift the TPO asserting lack of jurisdiction and lack of due process.
10. The RTC denied AFPFC's motion on December 17, 2008, and its motion for reconsideration on March 6, 2009.
11. AFPFC petitioned the Court of Appeals for certiorari, which was denied on November 29, 2011. AFPFC's motion for reconsideration was subsequently denied.
12. AFPFC then filed a petition for review on certiorari before the Supreme Court.

****Issues:****

1. Proper compliance by the RTC with procedural due process and jurisdiction over the military institution (AFP Finance Center).
2. Validity of ordering automatic deductions from S/Sgt. Yahon's retirement benefits for spousal support against the prohibitions in other laws (P.D. No. 1638 and R.A. No. 8291).

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

1. ****Procedural Due Process:**** The Court rejected the AFPFC's argument that it was denied due process, stating that the concerned parties (S/Sgt. Yahon) were given due notice and opportunities to contest the orders but failed to do so.

2. **Jurisdiction:** The Court affirmed that as per R.A. No. 9262, the court's orders are valid and applicable to the employer of the petitioner's spouse, including military institutions.
3. **Applicability of R.A. No. 9262 Over Previous Laws:** The Court held that R.A. No. 9262, being the later enactment, makes explicit exceptions to deduction prohibitions in P.D. No. 1638 and R.A. No. 8291. Thus, ordered deductions for spousal support from S/Sgt. Yahon's retirement benefits are lawful.
4. **Public Funds Argument:** The Court rejected AFPFC's argument likening pension funds to public funds, emphasizing that such deductions pertain to the support enforcement provision under R.A. No. 9262.

Doctrine:

- **Precedence of Later Enactments:** Later statutes expressing legislative will override previous laws if there is irreconcilable conflict.
- **Spousal and Child Support Under R.A. No. 9262:** The Act's provision for automatic income deductions for spousal and child support prevails over laws prohibiting attachment or garnishment of retirement benefits.
- **Application of R.A. No. 9262:** The Act's mandates apply to all employers, public and private, including military institutions.

Class Notes:

- **Key Legal Concepts:**
 - Protection Orders (TPO and PPO) under R.A. No. 9262
 - Compulsory Spousal Support
 - Conflict between laws: Later enactments prevail
 - Jurisdiction over government agencies in family law matters
- **Statutes:**
 - Republic Act No. 9262 (Anti-Violence Against Women and Their Children Act of 2004)
 - Presidential Decree No. 1638
 - Republic Act No. 8291 (Government Service Insurance System Act of 1997)
 - Rule 39, Section 13 of the 1997 Rules of Civil Procedure

Historical Background:

The case contrasts modern protective legislations (R.A. No. 9262) against historical prohibitions on garnishment, reflecting evolving societal priorities towards safeguarding women and children from abuse and ensuring economic protection is part of judicial remedies. The ruling highlights judicial adaptability in the face of legislative developments aimed at addressing systemic and personal violence within domestic settings while

interacting with military structures.