

Title: Villafuerte v. Cordial, 876 Phil. 419; 118 OG No. 24, 6952 (2022)

Facts:

On July 18, 2014, Constantino H. Cordial Jr., Mayor of Caramoan, Camarines Sur, and Irene R. Breis, Vice-Mayor of Caramoan, were administratively charged with Grave Misconduct, Dishonesty, and Conduct Prejudicial to the Best Interest of Service. The complaint was filed by Chief of Task Force Sagip Kalikasan Fermin M. Mabulo, Municipal Councilors Eduardo B. Bonita, Lydia Obias, and former Municipal Councilor Romeo Marto, docketed as Administrative Case No. 003-2014 before the Sanggunang Panlalawigan's Special Committee on Administrative Cases.

The complaint arose when the respondents allegedly passed Resolution No. 48, requesting the removal of Task Force Sagip Kalikasan from Caramoan without proper deliberation. This followed an inspection conducted by the Task Force in Barangay Gata, which discovered illegal mining activities. The Task Force found people engaged in illegal mining and had to ask them to stop due to the lack of necessary permits.

Respondents filed a Motion for Extension to File Answer but instead filed a Motion to Dismiss, challenging the jurisdiction of the Special Committee and citing improper publication of the rules of procedure (Resolution No. 13, Series of 2013). The Sanggunang Panlalawigan denied the motion on October 28, 2014, maintaining the publication was done as per Resolution No. 151, Series of 2013.

Respondents filed a Motion for Reconsideration, which was also denied. Consequently, the Sanggunang Panlalawigan placed the respondents under preventive suspension for 60 days. Respondents sought relief from the RTC, arguing the non-publication of Resolution No. 13-2013 nullified the Sanggunang Panlalawigan's jurisdiction.

The RTC ruled in favor of the respondents, holding the non-publication stripped the Sanggunang Panlalawigan of jurisdiction.

Issues:

1. Whether the non-publication of Resolution No. 13-2013 divested the Sanggunang Panlalawigan of jurisdiction over the administrative case.
2. Whether direct resort to the Supreme Court was proper without exhausting administrative remedies.

Court's Decision:

The Supreme Court ruled in favor of the petitioners, reinstating the orders and resolution of the Sanggunang Panlalawigan.

1. Publication Requirement:

The court differentiated between laws of general applicability and internal, interpretative regulations. It held that municipal ordinances and resolutions, particularly those procedural in nature and not penal or related to taxes, do not need publication. Resolution No. 13-2013 fell under this category, being procedural and not imposing any sanctions. Therefore, its non-publication did not impact due process or the jurisdiction of the Sanggunang Panlalawigan.

2. Jurisdiction and Administrative Remedies:

The court held that jurisdiction over administrative complaints against municipal officials under Sections 61 and 62 of the Local Government Code (LGC) was vested in the Sanggunang Panlalawigan. Additionally, the exhaustion of administrative remedies was necessary unless exceptions applied – such as when the case raises purely legal questions. The court found that the primary question involved procedural law, a legal matter rather than a factual dispute.

Doctrine:

The ruling established that procedural rules issued by local government units, particularly those not involving penalties or taxes, do not require publication to be effective. Jurisdiction over administrative complaints is determined by the complaint itself and conferred by law. The doctrine of exhaustion of administrative remedies mandates that available administrative remedies must be pursued before seeking judicial intervention unless exceptions apply.

Class Notes:

1. Publication Requirement:

- Art. 2, Civil Code of the Philippines.
- Tañada v. Tuvera interpretations.
- Specific applicability of the Local Government Code.

2. Jurisdiction:

- Sections 61, 62, LGC of 1991.
- Administrative Order No. 270.

3. Procedural Law vs. Substantive Law:

- Procedural laws guide methods and means by which rights are enforced.
- Substantive laws define rights and responsibilities.

4. Exhaustion of Administrative Remedies:

- General rule and exceptions.
- Hierarchy of courts principle.
- Purely legal questions allow direct recourse to higher courts.

Historical Background:

The case exemplifies post-EDSA reforms where oversight mechanisms against local officials were strengthened to ensure accountability. Laws such as the Local Government Code of 1991 were promulgated to decentralize authority and provide clear protocols for administrative proceedings, intending to foster transparency and responsible governance at local levels.

Sources:

- Supreme Court E-Library,
- 876 Phil. 419,
- 118 OG No. 24, 6952 (June 13, 2022).