

Title: Porto et al. v. Grant Institute of Trade & Technology, Inc. et al.

Facts:

In 2019, Jhon Kenneth M. Porto, Chennie Ann Rose R. Elca, and Jomar Jonhedel B. Bruto, along with others, filed consolidated complaints for Estafa and Falsification against directors of Grant Institute of Trade & Technology, Inc. (GITT), alleging they were misled into enrolling in an unaccredited Cruise Ship Management Course. GITT operated without requisite accreditation from the Technical Education & Skills Development Authority (TESDA). The Office of the City Prosecutor (OCP) of San Pablo City found probable cause for Estafa against the respondents due to misrepresentation about their accreditation but dismissed the Falsification charge as it was absorbed in the Estafa charge.

The directors of GITT contested the OCP's decision through a Petition for Review to the Office of the Regional Prosecutor (ORP) for Region IV, arguing that they applied for accreditation in good faith, but their application process was mismanaged by a subordinate, and that no payments from the complainants had been evidenced. The ORP reversed the OCP's decision, citing insufficient evidence of intent to defraud and absence of tuition payment evidence.

Petitioners filed a Joint Petition for Certiorari with the Court of Appeals (CA) contesting the ORP's reversal on grounds of grave abuse of discretion. The CA dismissed the petitions for procedural noncompliance, such as non-payment of docket fees, lack of signatures, and inadequate addresses. An appeal was made for reconsideration, citing the pandemic as a cause for leniency. The CA upheld its dismissal, further attributing it to the petitioners' failure to exhaust administrative remedies by not appealing to the Secretary of Justice as per DOJ Department Circular No. 70-A. The case was then elevated to the Supreme Court.

Issues:

1. Was it appropriate for the CA to dismiss the petitions based on procedural defects?
2. Did the CA err in requiring an appeal to the Secretary of Justice before judicial recourse?
3. Was there a grave abuse of discretion by the ORP in setting aside the OCP's ruling?

Court's Decision:

The Supreme Court denied the petition. It affirmed the CA's dismissal due to procedural defects, iterating they were jurisdictional barriers. The Court noted these defects included the crucial failure to pay docket fees, which hindered jurisdiction acquisition by the appellate court. Although addressing the CA's mistake regarding the necessity of an appeal

to the Secretary of Justice, the Court emphasized the procedural faults were independently fatal.

Doctrine:

The decision reinforces the doctrine that compliance with procedural rules is essential and jurisdictional, particularly the timely payment of docket fees to confer jurisdiction on courts. The judgment also clarified procedural appellate remedies within the DOJ, particularly post-amendments restoring finality to ORP decisions concerning cases cognizable by first-level courts.

Class Notes:

- Key elements of Estafa: Misrepresentation has to be intentional and damages incurred, with clear evidence of victimizing purpose.
- Procedural rules: Strict adherence required, especially where jurisdiction hinges on compliance.
- DOJ procedure: Post-amendments localize finality of decisions in specific cases, stressing administrative remedy exhaustion principles.

Historical Background:

This case reflects broader systemic issues within Philippine educational institutions regarding regulatory compliance. It underscores the judiciary's role in mitigating fraudulent academic practices and maintaining procedural integrity in legal redress pathways. The procedural intricacies explored elucidate evolving jurisprudence in handling administrative and judicial transitions post-delegation adjustments.