

**Title:** Aguinaldo vs. Secretary of Local Government

**Facts:**

- Election and Coup Allegation:** Rodolfo E. Aguinaldo was elected Governor of Cagayan during the local elections on January 17, 1988, taking office around March 1988. Following a failed coup d'état in December 1989, he was implicated for alleged disloyalty to the Republic.
- Initial Actions by Secretary:** On December 4, 1989, the Secretary of Local Government required Aguinaldo to explain why he should not be suspended or removed for disloyalty, which Aguinaldo responded to with a denial, though admitting sympathy for the rebel soldiers.
- Formal Complaint and Suspension:** On December 7, 1989, mayors from various municipalities in Cagayan filed a formal complaint against Aguinaldo for disloyalty and constitutional violations. On January 5, 1990, Aguinaldo's response was received, leading to his suspension for 60 days pending investigation.
- Investigation and Decision:** During the investigation, Aguinaldo did not present evidence or cross-examine witnesses. Subsequently, on March 19, 1990, the Secretary ordered Aguinaldo's dismissal, and Vice-Governor Melvin Vargas was installed as the acting Governor.
- Electoral Proceedings:** Despite his dismissal, Aguinaldo filed a candidacy for governor in the May 11, 1992 elections. The Commission on Elections (COMELEC) initially disqualified him on May 9, 1992 but allowed his candidacy to proceed pending court review, per an urgent motion filed by Aguinaldo.
- Supreme Court's Temporary Order:** Aguinaldo then sought the Supreme Court's intervention, resulting in a temporary restraint on the COMELEC from enforcing his disqualification, allowing the votes' canvassing to continue but withholding the proclamation of winners.
- Court Ruling on Disqualification:** On June 9, 1992, the Supreme Court annulled COMELEC's disqualification order, stating the Secretary's decision was not final. Aguinaldo won the elections by a landslide.

**Issues:**

1. **Validity of the Secretary's Power Post-1987 Constitution:** Whether the Secretary of Local Government retained the power to suspend or remove local officials after the enactment of the 1987 Constitution.
2. **Reappointment of Acting Governor:** Whether the Secretary's authority extended to appointing Melvin Vargas as the acting Governor following Aguinaldo's dismissal.
3. **Standard of Proof:** Whether the alleged disloyalty needed to be proved beyond a reasonable doubt or by a mere preponderance of evidence in administrative cases.
4. **Effect of Re-Election on Pending Administrative Cases:** Determining if Aguinaldo's re-election rendered the administrative case moot and academic.

**Court's Decision:**

1. **Secretary's Power:** The Court ruled that the Secretary's removal power persisted despite the 1987 Constitution. This power was vested in the President's control and general supervision over local governments under Articles VII and X.
2. **Appointment of Acting Governor:** The Court found that under Section 48(1) of B.P. Blg. 337, the Vice-Governor legitimately assumed the Governor's office due to Aguinaldo's removal.
3. **Standard of Proof:** The Court held that administrative proceedings only required substantial evidence for suspension or removal, not proof beyond a reasonable doubt, distinguishing these proceedings from criminal prosecutions.
4. **Effect of Re-Election:** The Court determined that re-election nullified the pending administrative case as it implied the electorate's condonation of prior misconduct. The prior case thus became moot and academic following Aguinaldo's re-election.

**Doctrine:**

- **Condonation Doctrine:** Re-election to office operates as condonation of an official's prior misconduct, preventing removal for acts from a previous term.
- **Standard in Administrative Cases:** Substantial evidence suffices for local officials' suspension/removal in administrative cases, as confirmed by precedents.

**Class Notes:**

- **Condonation Doctrine:** Each term is separate; re-election forgives prior term

misconduct.

- **Substantial Evidence:** Only substantial proof is needed in administrative cases, differentiating them from criminal cases requiring proof beyond a reasonable doubt.

**Statutes:**

- **B.P. Blg. 337, Sec. 60:** Grounds for suspension/removal of local officials.

- **1987 Constitution Articles VII (17), X (4):** President's control and supervision over executive functions and local governments.

**Historical Background:**

- The case reflects the transition challenges in applying pre-1987 local government regulations under a new constitutional framework. It underscores evolving legal interpretations amidst political stability efforts following attempts to overthrow the government. Prominent political figures' accountability, especially post-coup scenarios, tested legal doctrines and administrative jurisprudence.

This case underlines the judicial balancing act between legal adherence and democratic processes.