

Title: Crisostomo v. The Court of Appeals and The People of the Philippines

Facts:

Isabelo T. Crisostomo, the President of the Philippine College of Commerce (PCC), faced multiple administrative cases and charges under the Anti-Graft and Corrupt Practices Act. On October 22, 1976, he was preventively suspended. Subsequently, P.D. No. 1341 was issued on April 1, 1978, converting PCC into the Polytechnic University of the Philippines (PUP). After Crisostomo's acquittal in 1980, he sought reinstatement, leading to a legal battle. Despite his efforts and a partial writ of execution for his reinstatement, Dr. Jaime Gellor was appointed as the acting president of PUP in 1992. Crisostomo challenged the denial of reinstatement and benefits accruing past the PCC to PUP conversion. This case escalated to the Court of Appeals, which limited his recovery to periods up until the conversion.

Procedural Posture:

Crisostomo's motion for execution was initially granted by the Regional Trial Court, leading to a legal tangle including a contempt citation against Dr. Gellor and an intervention by the Department of Education. The People of the Philippines then filed a petition for certiorari and prohibition with the Court of Appeals, which issued a temporary restraining order and eventually set aside the trial court's orders. Crisostomo then petitioned the Supreme Court for review.

Issues:

1. Whether the conversion of PCC into PUP through P.D. No. 1341 constituted the abolition of PCC, thus nullifying Crisostomo's claim for reinstatement.
2. Whether changes in the organizational and operational structure of the PCC, through its conversion to PUP, affect the legal and corporate existence, thereby impacting Crisostomo's presidency.
3. The applicability of P.D. No. 1437 and its impact on Crisostomo's contention for reinstatement and entitlement to salaries and benefits.

Court's Decision:

The Supreme Court modified the Court of Appeals' decision, affirming that PCC's conversion to PUP did not abolish the former but merely rebranded and expanded it, maintaining its corporate life. However, it ruled that reinstatement was not possible due to P.D. No. 1437, which allowed for the termination of incumbent presidents of state universities and colleges, including Crisostomo, making him only entitled to retirement benefits or separation pay

post-termination of his term.

Doctrine:

The conversion of an educational institution (from PCC to PUP in this case) does not imply the abolition of the institution's prior identity but represents an expansion or redirection of its objectives, curricular offerings, and organizational structure. Furthermore, the legal and organizational changes do not affect the corporate existence of the institution.

Class Notes:

- ****Presidential Decrees****: Highlight the impact of P.D. No. 1341 and P.D. No. 1437 on state colleges and universities concerning the appointment, term, and rights of university presidents.
- ****Preventive Suspension****: Underlines the use of preventive suspension in administrative and criminal proceedings against public officials, affording due process.
- ****Reinstatement Rights****: Details on the limitations of reinstatement rights post-acquittal in criminal proceedings, especially when subsequent legal or organizational changes have occurred.
- ****Legal Interpretation of Conversion vs. Abolition****: Differentiates between the legal connotations of "converting" an institution and "abolishing" it to establish a new one.

Historical Background:

Situated in a politically tumultuous period, this case illustrates the complexities of governance and administrative justice in the Philippines during the late 20th century. The Marcos regime's use of Presidential Decrees to restructure higher education governance mirrors broader themes of authoritarian control and reformative agendas, reflecting the political landscape of the time.