

PNP SUPT. FLORENCIO D. FIANZA, PETITIONER, VS. THE PLEB (PEOPLE'S LAW ENFORCEMENT BOARD) OF THE CITY OF BAGUIO, THE NATIONAL POLICE COMMISSION (NAPOLCOM), SPO3 FERNANDO TAFALENG...

G.R. No. 109638. March 31, 1995

Ponente: ROMERO, J.

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ROMERO, J.:

Before us are consolidated petitions for prohibition and declaratory relief with a prayer for temporary restraining order involving the issue of whether the People's Law Enforcement Board (PLEB) has jurisdiction over complaints filed by PNP personnel against their superiors.

The salient facts bearing on these petitions follow.

In the first case (G.R. No. 109638), petitioner, police superintendent Florencio D. Fianza was assigned as Provincial Director of the Philippine National Police (PNP) for the province of Benguet (including the City of Baguio) with headquarters at Camp Dangwa, La Trinidad, Benguet.[1]

SPO3 Jesus Mason, SPO3 Fernando Tafaleng, PO3 Octavio Pawingi, PO3 Ferdinand Segundo, PO3 Metodio Aquino, PO3 Benjamin Nakigo, PO3 Salvador Galiste, PO3 Romeo Bautista and PO3 Alfredo Matias, hereinafter referred to as the respondent policemen, were members of the PNP assigned to the Baguio City Police Station.

On June 19, 1992, respondent policemen filed an Amended Complaint with the Baguio PLEB against herein petitioner Supt. Florencio D. Fianza for "Grave Misconduct and Irregularity in the Performance of Duty," docketed as Administrative Case No. 007-92. The case also named as respondent PNP Supt. Camilo S. Dugayen, who is not a party to the instant petition.

The Amended Complaint[2] reads in part:

"AMENDED COMPLAINT

The undersigned, all of legal age, Filipino Citizens, and organic members of the Baguio City Police Station/PNP and with residence at Baguio City, Philippines, accuse POLICE PROVINCIAL DIRECTOR FLORENCIO D. FIANZA for Grave Misconduct and Irregularity in the performance of duty in violation of Rule VI, paragraphs b and c of the Napolcom Memorandum Circular No. 91-002 in relation to Secs. 41, 42, 43, 44 and 45 of Republic Act No. 6975, otherwise known as the Philippine National Police (PNP) law and Police Superintendent CAMILO S. DUGAYEN of Grave Misconduct, Neglect of Duty, Incompetence, Dishonesty, Irregularity in the performance of duty in violation of Rule VI, paragraphs b, c, d, and f of the Napolcom Memorandum Circular No. 91-002 in relation to Secs. 41, 42, 43 44 and 45 of Republic Act No. 6975, otherwise known as the Philippine National Police (PNP) Law committed as follows:

1. That on January 13, 1992, respondent CAMILO S. DUGAYEN issued Special Order No. 04-92 dropping the names of SPO3 FERNANDO TAFALENG, PO3 OCTAVIO PAWINGI, PO3 BENJAMIN NAKIGO, PO3

EUSEBIO BENMAHO, PO2 FERDINAND SEGUNDO AND PO2 LORENZO TALLEDO from the rolls of the Baguio City Police Station without benefit of due process of law;

1-a. That the aforestated unwarranted action of the respondent CAMILO S. DUGAYEN was supposedly in total and blind obedience to an unlawful and illegal order from his superior officer, respondent FLORENCIO D. FIANZA, who was then the Provincial Director of the PNP Benguet Provincial Command and who issued SPECIAL ORDER No. 01-92 directing respondent CAMILO S. DUGAYEN to transfer the following persons from the Baguio City Police Station to Mankayan Police Station, to wit:

- SPO3 FERNANDO S. TAFALENG
- PO3 OCTAVIO D. PAWINGI
- PO3 BENJAMIN NAKIGO
- PO3 EUSEBIO D. BENMAHO
- PO2 FERNANDO SEGUNDO
- PO2 LORENZO TALLEDO

2. That on January 18, 1992, respondent CAMILO S. DUGAYEN issued Special Order No. 06-92 dropping from the rolls of the Baguio City Police Station of following: SPO3 JESUS MASON, PO3 SALVADOR GALISTE, PO3 ROMEO BAUTISTA, PO3 ALFREDO MATIAS AND PO2 METODIO AQUINO without formal investigation;

2-a That the aforestated unwarranted and irregular action of the respondent Camilo S. Dugayen, was supposedly in total and blind obedience to the unlawful and irregular radio message from his superior officer, FLORENCIO D. FIANZA, directing him to transfer the following non-officers from the Baguio City Police Station to:

- Kibungan Police Station:

- SPO3 Jesus T. Mason
- PO3 Salvador M. Galiste

- Tuba Police Station

- PO3 Romeo M. Bautista

- Baguias Police Station

- PO3 Alfredo A. Matias
- PO2 Metodio J. Aquino

2-b. That the orders of the respondent FLORENCIO D. FIANZA are highly irregular and illegal having been issued in utter and total disregard to the provisions of R.A. 6975 otherwise known as the PNP Law and the provisions of Napolcom Memorandum Circular No. 91-002 evidencing grave misconduct and irregularity in the performance of duty on his part;

2-c. That respondent CAMILO S. DUGAYEN cannot find shelter and defense by simply invoking obedience to patently and highly irregular orders of a superior officer of which he is not duty bound to obey being contrary and violative of the PNP Law and the Napolcom Memorandum Circular No. 91-002 of which he is expected to know by heart being a ranking officer mandated by law to know the same;

x x x x x x x x."

Respondent policemen, in their complaint, allege that their transfer from the Baguio City Police Station to other stations and their being dropped from the rolls were irregularly and illegally made. The orders issued by Supt. Camilo S. Dugayen, apparently upon the direction of Supt. Florencio D. Fianza, herein petitioner, were, according

to respondent policemen, instigated by or made in retaliation to the raids they conducted on jueteng operations in Baguio. The policemen claim that Supt. Dugayen, their Station Commander, twice castigated them for conducting said raids and ordered the release of the cash and paraphernalia seized, as well as persons accosted, as a consequence of the raids.[3]

Petitioner contended, through counsel, that cases of this nature are not within the competence and jurisdiction of public respondent PLEB since it involves an internal organizational matter of the PNP. Petitioner argued that:

"This is not a 'citizen's complaint' against the members of the PNP. Rather it is a case of PNP members versus PNP members/officers. Although there is an ambiguous if tricky allegation of a purported 'dropping from the rolls,' there is no question that the case essentially involves some PNP members who have decided to resist or contest their transfer or reassignment and selected this forum wherein 'to wash their dirty linen' in an evident attempt to harass or embarrass (sic) their superior officers.

You will agree that the power to direct technical and strategic deployment, placement and/or specific utilization of individual PNP members is vested in the various levels of PNP commanders and is not within the purview of the 'operational supervision and control' now exercised by local civilian officials." [4]

Petitioner further claimed that the PLEB can entertain only citizen's complaints and not complaints lodged by PNP personnel.

Public respondent PLEB, in an order dated November 13, 1992, ruled that it had jurisdiction to try and hear Admin. Case No. 007-92 for Grave Misconduct and Irregularity of Performance of Duty. It held that the complaint of the policemen can be considered a citizen's complaint since the policemen have the same rights as other citizens. Furthermore, the PLEB reasoned:

"(T)he charges contained in the complaint are very grave and deserve to be heard. To rule otherwise would mean that there would be no remedy for policemen who have legitimate grievances against their superiors." [5]

Upon the request of petitioner,[6] the Baguio PLEB referred the matter of its jurisdiction to public respondent National Police Commission (NAPOLCOM). The latter, through the Acting Regional Director for the Cordillera Administrative Region, rendered an opinion upholding the PLEB's assumption of jurisdiction:

"x x x. It must be noted that the word, 'CITIZEN'S COMPLAINT,' is a misnomer and do (sic) not necessarily signify to a complaint filed by a private party or ordinary citizen alone but rather the phrase includes or embraces also all complaints filed by any citizen of the Philippines whether he or she is a government employee or an ordinary person." [7]

As a consequence, the PLEB continued to assume jurisdiction, ordered the submission of counter-affidavits and set the case for hearing on April 30, 1993.

Petitioner brought the instant petition (G.R. No. 109638) for prohibition and declaratory relief with prayer for temporary restraining order to restrain the Baguio PLEB from trying said administrative case[8] for lack of jurisdiction over the same.

In the other petition (G.R. No. 109639), petitioner Supt. July Cordoviz likewise claims that the PLEB has no jurisdiction over the administrative case[9] filed against him by Pat. Ray Ekid, for allegedly threatening the latter and his family if he would not report to the former's office.[10]

In an Order dated March 19, 1993,[11] public respondent PLEB denied petitioner's motion to dismiss and ruled that it has proper jurisdiction over the said administrative case.

Supt. Cordoviz then brought this original action for prohibition and declaratory relief with prayer for a temporary restraining order.

In support of their contention that the PLEB has no jurisdiction over the complaint filed by respondent policemen, petitioners advance the following arguments:

In the first place, the PLEB has jurisdiction over citizen's complaints but not over matters involving internal discipline within the PNP. Cases against PNP members are either citizen's complaints or breaches of internal discipline.[12]

A citizen's complaint is one initiated by a private citizen qua private citizen. Since respondent policemen have filed their complaints against petitioners, not in their capacity as private citizens but as members of the PNP, their complaint cannot be denominated a citizen's complaint.

This is not to say that they are left with no recourse or relief for complaints involving breaches of internal discipline may and should be raised with their superiors or commanders.[13] Respondent policemen's complaint concerning petitioner's issuance of illegal and irregular transfer and dismissal orders is an internal organizational affair of the PNP, involving as they do transfers, reassignment or deployment orders which, under Sec. 26 of Republic Act No. 6975,[14] are under the command and direction of the Chief of the PNP and may be delegated to subordinate officials.[15]

In the second place, Rule VI, Section 2 A, B & C of the PLEB Rules[16] enumerates acts constituting simple, less grave and serious irregularities in the performance of duties as well as simple, less grave and serious misconduct. Petitioner Fianza's alleged issuance of illegal transfer or reassignment orders are not among the acts constituting either misconduct or irregularity in the performance of duty.

In their consolidated comment,[17] public respondents, People's Law Enforcement Board of Baguio City and the NAPOLCOM, assert the jurisdiction of the PLEB to take cognizance of the complaints against petitioners on the following grounds:

Respondent policemen may file a citizen's complaint since they do not cease to be citizens of the Philippines despite the uniform they wear.

Nothing in the law, or Republic Act No. 6975, justifies the conclusion that PNP members no longer have the right to file a citizen's complaint.

After conceding that offenses by PNP men may be classified either as citizen's complaint or as minor offenses involving internal discipline, public respondents contend that complaints against members of the PNP are not necessarily classified as merely offenses involving internal discipline.

In G.R. No. 109638, the accusation against petitioner Fianza concerns protection of jueteng operators, which, under the PLEB Rules, constitutes a grave offense. It may even be considered as maliciously refraining from instituting prosecution for the punishment of violators of the law or tolerating the commission of criminal offenses under the Revised Penal Code.[18]

In G.R. No. 109639, public respondents contend that the complaint against petitioner Cordoviz is covered by Rule VI-H (r) of the PLEB Rules, thus:

"x x x x x x x x;

r. Threaten another with the infliction upon the person, honor or property of the latter or of his family of any wrong amounting to a crime (Grave Threats - Art. 282);

x x x x x x x x."

Since respondent policeman in this case was never under petitioner's command, the complaint cannot plausibly be a matter involving internal discipline.

Finally, public respondents assert that the policy of the law is for wider civilian participation in PNP affairs. The Constitution envisions a police force civilian in character. The PLEB, as an avenue for greater citizen involvement in the police force, must be deemed to have broad jurisdiction to effectuate this constitutional policy and promote people empowerment.

The issue then before us in these twin petitions involves a clarification of the jurisdiction of PLEB as applicable to the specific facts of this case and not merely as a petition for declaratory relief over which this Court has no jurisdiction.

In G.R. No. 109638, it is whether or not the PLEB may take cognizance of a case for grave misconduct and irregular performance of duty filed by nine (9) policemen against their superior, Supt. Florencio D. Fianza.

In G.R. No. 109639, at issue is whether or not the PLEB may hear and try a case for "Threats, Grave Abuse of Authority and Conduct Unbecoming an Officer" brought against Supt. July Cordoviz by a policeman outside the ambit of his command.

At this point, a review of the PLEB's organic law is in order. The PLEB, established pursuant to Sec. 43 of Republic Act No. 6975,[19] is part of the PNP's administrative disciplinary machinery.

Sec. 43 reads, in part:

"Sec. 43. People's Law Enforcement Board (PLEB). - (a) Creation and Functions. – Within thirty (30) days from the issuance of the implementing rules and regulations by the Commission, there shall be created by the sangguniang panglunsod/bayan in every city and municipality such number of People's Law Enforcement Boards (PLEBs) as may be necessary: Provided, That there shall be at least one (1) PLEB for every municipality and for each of the legislative districts in a city. The PLEB shall have jurisdiction to hear and decide citizen's complaints or cases filed before it against erring officers and members of the PNP. There shall be at least one (1) PLEB for every five hundred (500) city or municipal police personnel.

x x x x x x x x

(Italics supplied)

Each PLEB is composed of a member of the sangguniang panglunsod/bayan chosen by his respective sanggunian; barangay captain of the city or municipality concerned chosen by the association of barangay captains; and three other members who shall be chosen by the peace and order council from among the respected members of the community known for their probity and integrity. Membership in the PLEB is a civic duty; however PLEB members may be paid per diem as may be determined by the city or municipal council from city or municipal funds.[20]

For emphasis, the abovesited provision of law states that the PLEB has jurisdiction to hear and decide citizen's complaints or cases against erring officers and members of the PNP.

Petitioners, PNP Superintendents Fianza and Cordoviz, are in effect asking us to rule that the complaints against them are not covered by the PLEB's jurisdiction because they cannot be considered as citizen's complaints.

Under Sec. 41 (a) of the PNP's enabling act, a citizen's complaint is "any complaint by an individual person against any member of the PNP." Penalties imposable include withholding of privileges, restriction to specified

limits, suspension or forfeiture of salary, any combination thereof or dismissal. When the penalties imposable do not exceed fifteen days, the citizen's complaint should be brought before the Chief of Police; and if for a period not less than sixteen but not exceeding thirty days, before the city or municipal mayors. It is when the offense is punishable by the abovementioned penalties and for a period exceeding thirty days or by dismissal, that the complaint should be brought before the PLEB.

Section 41 paragraph (b) provides:

"(b) Internal Discipline. — In dealing with minor offenses involving internal discipline found to have been committed by any regular member of their respective commands, the duly designated supervisors and equivalent officers of the PNP shall, after due notice and summary hearing, exercise disciplinary powers as follows:

- (1) Chiefs of police or equivalent supervisors x x x;
- (2) Provincial directors or equivalent supervisors x x x;
- (3) Police regional directors or equivalent supervisors x x x;
- (4) The Chief of the PNP x x x."

Nowhere in the aforecited provision is the PLEB granted jurisdiction over offenses concerning internal discipline.

Rule II, section 1 of the PLEB Rules defines a citizen's complaint as pertaining to "any complaint initiated by a private citizen or his duly authorized representative on account of an injury, damage or disturbance sustained due to an irregular or illegal act committed by a member of the PNP."

A citizen's complaint, then, is one filed by a private citizen against a member of the PNP for the redress of injury, damage or disturbance caused by the latter's illegal or irregular acts.

Petitioner contends that since the complainants are PNP policemen, they cannot be classified as "private citizens" for purposes of filing a "citizen's complaint." Public respondents disagree and claim that respondent policemen, notwithstanding their uniforms, do not cease to be citizens.

On this point, we rule that although respondent policemen continue to be citizens, as public respondents contend, they are not the "private citizens" referred to in the laws cited above. Clearly, the term "private citizens" does not ordinarily include men in uniform, such as the respondent PNP men. This is particularly evident in the PNP law which uses the term "members of the PNP" as well as "private citizens" to refer to different groups of persons and not interchangeably. The "plain meaning rule" or *verba legis* in statutory construction is applicable in this situation. When the words of a statute are clear, plain and free from ambiguity, it must be given its literal meaning and applied without attempted interpretation.[21] The term "private citizen" in the PNP Law and PLEB Rules is used in its common signification and was not meant to refer to the members of the PNP, such as respondent policemen.

One of the avowed objectives of the PLEB is to enhance civilian participation in the disciplinary process of errant PNP members.[22] The PLEB is part of the system of coordination and cooperation among the citizenry, local executives and PNP provided for in the law creating the Philippine National Police.[23]

The citizen's complaint envisioned under Republic Act No. 6975 normally pertains to complaints by private individuals against PNP men and not by PNP men against their co-members or officers in a professional capacity. An example used in the Bicameral Conference Committee hearings is that of a policeman who takes fish from the market without paying for it.[24] Aside from the criminal liability attaching to the act of the policeman cognizable

by the courts, the private party prejudiced can sue him before the PLEB.

However, respondent policemen are not absolutely excluded from bringing citizen's complaints with the PLEB. PNP members can file suit as private citizens only when they do so in their private capacity and not as members of the PNP. This means that the complaining PNP personnel can sue on matters of private concern and not on matters properly cognizable by the PNP chain of command. If a policeman complains against another colleague before the PLEB, he can do so when the subject matter of the complaint is one that can similarly be raised by a private individual or citizen.

But if the subject of the complaint bears a direct relation to the office of the complainant-policeman as member of the PNP, it can hardly be considered as a citizen's complaint and is, therefore, neither cognizable nor triable by the PLEB.

This conclusion is ineluctable as the PNP is the proper venue for matters involving its internal organization or discipline. The PNP hierarchy possesses the power and responsibility over its men in these matters. Section 81 of Republic Act No. 6975 reads:

"SEC. 81. Complaints and Grievances. – Uniformed personnel shall have the right to present complaints and grievances to their superiors or commanders and have them heard and adjudicated as expeditiously as possible in the best interest of the service, with due regard to due process in every case. Such complaints or grievances shall be resolved at the lowest possible level in the unit of command and the respondent shall have the right to appeal from an adverse decision to higher authorities."[25]

No better forum for the resolution of internal discipline and administrative matters can be found than the organization (PNP) itself, particularly in the enforcement of its professional code of conduct.

In matters pertaining to their job or office, PNP men are afforded the proper channel for their complaints against colleagues, superiors or commanding officers. The Chief of Police, Provincial Director, Police Regional Director and PNP Chief are the proper conduits for offenses involving internal discipline, such as simple misconduct or negligence, insubordination, frequent absences or tardiness, habitual drunkenness and gambling prohibited by law.[26] Even the PLEB Rules provide that jurisdiction over offenses involving breach of internal discipline (or any offense committed by a member of the PNP involving and affecting order and discipline within the ranks of the police organization) belongs to the duly designated supervisors and equivalent officers of the PNP. The Chiefs of Police, Provincial Directors, Police Regional Directors or their equivalent supervisors and the PNP Chief exercise disciplinary powers for breaches of internal discipline committed by any regular member of their respective commands.[27]

Having dealt with the areas over which the PLEB exercises jurisdiction, the next step is to determine whether the cases at bench fall within the ambit of said jurisdiction.

Respondent policemen in the first petition accuse petitioner Fianza of issuing illegal orders pertaining to transfers of assignment and dropping from the rolls without any formal investigation. They accuse him of issuing these orders in retaliation for their raids on jueteng operations protected by him.

The merits of the case are not disputed in the instant petition. What is at issue is where the case should be adjudicated.

Though the policemen impute ill motives to petitioner for issuing illegal orders, there is no question that the principal and basic issue is the wrongful issuance of such order. In other words, accusations of "coddling" or protecting jueteng operators do not alter the fact that the main dispute refers to the ensuing transfer and dismissal orders issued by respondent policemen's superiors in the PNP.

We pointed out earlier that the Chief of the PNP and his subordinates have the power to transfer and utilize PNP personnel in accordance with their strategy.[28] The issuance of the questioned orders comes within the purview of the abovementioned power. Hence, the propriety or illegality of the orders should be raised before the proper superiors or commanding officers[29] and not before a civilian body like the PLEB. To repeat, nowhere in the law creating the PLEB is this power or function mentioned.[30]

For the foregoing reasons, we rule that the PLEB has no jurisdiction over the complaint lodged against petitioner Fianza by respondent policemen.

A close scrutiny of the second petition (G.R. No. 109639) discloses that the administrative case[31] was for threats made by a superior officer of the PNP against another PNP policeman who is not under his command.

Again, the same cannot be considered as a citizen's complaint because the conduct complained of pertains to their work and offices. That the alleged threats were made in connection with private respondent policeman's position is shown by the following allegation in his complaint:

"x x x he pointed his right forefinger at me and shouted the following and I quote: 'SIKA, NO SAAN DA NGA AG-REPORT KANIAK IDIAY OPISINA, ITULOY KO DIAY ILLEGAL SEARCH NGA DEMANDA KANYAM'; meaning: YOU, IF YOU WILL NOT REPORT TO MY OFFICE, I WILL CONTINUE THE ILLEGAL SEARCH CHARGES AGAINST YOU;

x x x x x x x x"

Although complainant below was a policeman who did not belong to petitioner Cordoviz' command, the controversy between them continues to be a festering internal disciplinary matter. Who can better understand the standard of conduct imposed in the PNP than the members of the PNP themselves? Certainly, it is doubtful whether a civilian body like the PLEB can better police the ranks of the policemen. Accordingly, we rule that the complaint, like in the preceding case, is one which is properly lodged with their common superior or commanding officer and not with the PLEB.

WHEREFORE, the petitions are hereby GRANTED. The People's Law Enforcement Board of Baguio is directed to CEASE and DESIST from further trying Administrative Case No. 007-92 (Jesus Mason, et al. v. Supt. Florencio Fianza and Supt. Camilo Dugayen) and Administrative Case No. 042-92 (Pat. Ray Ekid v. Col. July Cordoviz).

SO ORDERED.

Narvasa, C.J., Feliciano, Padilla, Bidin, Regalado, Davide, Jr., Bellosillo, Melo, Quiason, Puno, Vitug, Kapunan, Mendoza, and Francisco, JJ., concur.

[1] At the time the petition was filed, however, petitioner had already been re-assigned as the Provincial Director for the province of Batangas.

[2] Rollo, pp. 20-21.

[3] Rollo, pp. 21-22.

[4] Letter of Counsel for the Respondent in Adm. Case No. 007--92, dated July 31, 1992 and Reply dated November 17, 1992, quoted in part in the Petition, pp. 5-6; Rollo, pp. 6-7.

[5] Rollo, p. 30.

- [6] Motion to Refer Issue of Jurisdiction to the Napolcom Hearing Officer and/or the National Police Commission, dated February 24, 1993; Rollo, p. 31.
- [7] Letter of Acting Regional Director Nestor A. Quintos, March 19, 1993; Rollo, p. 42.
- [8] Administrative Case No. 007-92.
- [9] Administrative Case No. 042-92.
- [10] Petition, p. 3; Rollo, p. 4.
- [11] Rollo, p. 23.
- [12] Rollo, p. 9.
- [13] Id.
- [14] Republic Act. No. 6975, "AN ACT ESTABLISHING THE PHILIPPINE NATIONAL POLICE UNDER A REORGANIZED DEPARTMENT OF THE INTERIOR AND LOCAL GOVERNMENT, AND FOR OTHER PURPOSES," Approved December 13, 1990; 87 O.G. No. 3.
- [15] Sec. 26 of Rep. Act No. 6975 reads in part:
- "Sec. 26. Powers, Functions and Term of Office of the PNP Chief. &mdah; The command and direction of the PNP shall be vested in the Chief of the PNP who shall have the power to direct and control tactical as well as strategic movements, deployment, placement, utilization, of the PNP or any of its units and personnel, including its equipment, facilities and other resources. Such command and direction of the Chief of the PNP may be delegated to subordinate officials with respect to the units under their commands, in accordance with the rules and regulations prescribed by the Commission. x x x."
- [16] Rules of Procedure Before the People's Law Enforcement Board, NAPOLCOM Memorandum Circular No. 91-002, Procedure in the Investigation and Disposition of Administrative Complaints Against Members of the Philippines National Police (PNP) Before the PLEB.
- [17] Rollo, p. 73.
- [18] Article 208, Revised Penal Code; Rule VI-H (a), Rules of Procedure Before the PLEB.
- [19] Supra, note 14.
- [20] Republic Act No. 6975, Sec. 43 (a), (b) & (c).
- [21] R. AGPALO, STATUTORY CONSTRUCTION 94 (2nd ed., 1990).
- [22] Conference Committee Reports, May 15, 1990, p. 4.
- [23] Republic Act. No. 6975, Sec. 2.
- [24] Ibid., May 29, 1990, p. 39.
- [25] Also see Sec. 26 and Sec. 41 (b) of Rep. Act No. 6975.
- [26] Sec. 41 (b), Rep. Act No. 6975.
- [27] Secs. 3 and 4, Rules of Procedure Before the PLEB.
- [28] Sec. 26, Rep. Act No. 6975.

[29] Such as those who are not involved in the controversy.

[30] Sec. 41 (a) and Sec. 43, Rep. Act No. 6975.

[31] Administrative Case No. 042-92.

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