

Republic of the Philippines
SUPREME COURT
Manila

2023 OCT 18 PM 3:17

EN BANC

DUTY TO ENERGIZE THE
REPUBLIC THROUGH THE
ENLIGHTENMENT OF THE
YOUTH (DUTERTE
YOUTH) PARTY-LIST
REPRESENTED BY
CHAIRMAN RONALD GIAN
CARLO L. CARDEMA &
REPRESENTATIVE
DUCIELLE MARIE S.
CARDEMA,

Petitioners,

- versus -

G.R. No. 261123
261123

COMMISSION ON
ELECTIONS, HOUSE OF
REPRESENTATIVES,
KOMUNIDAD NG
PAMILYA, PASYENTE AT
PERSONS WITH
DISABILITIES (P3PWD)
PARTY LIST & ITS
NOMINEES LED BY
ROWENA AMELIA V.
GUANZON,

Respondents.

X ----- X

COMMENT

*(on the Prayer to Cite Petitioners in Contempt
in Respondent P3PWD's Compliance
dated 08 August 2022)*

PETITIONERS Duty to Energize the Republic Through the Enlightenment of the Youth (DUTERTE YOUTH) Party-List Represented by Chairman Ronald Gian Carlo L. Cardema (hereinafter "Mr. Cardema") & Representative Ducielle Marie S. Cardema (hereinafter "Mrs. Cardema"); and Atty. Ferdinand S. Topacio

(hereinafter “Atty. Topacio”), though the undersigned counsels, respectfully aver as follows:

TIMELINESS

1. A compliance dated 08 August 2022 (to the Resolution dated 19 July 2022) was filed by respondents P3PWD with a prayer to cite petitioners in contempt for their alleged violation of the *sub judice* rule.

2. During the preliminary conference held on 03 October 2023, this Honorable Court, in open court, ordered the petitioners to file their comment thereon within fifteen (15) days, or until 18 October 2023. As such, the timeliness of this filing.

ARGUMENTS AND DISCUSSION

Respondents did not observe the proper procedure in filing the contempt cases.

3. Without a doubt, respondents P3PWD and/or Guanzon committed grave error in praying that petitioners be cited in contempt through its compliance to the Resolution of this Honorable Court. It has been established in our rules and jurisprudence that a petition for contempt, which is not initiated *motu proprio* by the court, must be filed by a party through a separate verified petition.

4. Under Rule 71 of our Rules of Court, the filing of Contempt requires that:

“Section 4. How proceedings commenced. — Proceedings for indirect contempt may be initiated *motu proprio* by the court against which the contempt was committed by an order or any other formal charge requiring the respondent to show cause why he should not be punished for contempt.

“In all other cases, charges for indirect contempt shall be commenced by a **verified petition with supporting particulars and certified true copies of documents** or papers involved therein, and upon full compliance with the requirements for filing initiatory pleadings for civil actions in the court concerned. If the contempt charges arose out of or are related to a principal action pending in the court, the petition for contempt shall allege that fact **but said petition shall be**

docketed, heard and decided separately, unless the court in its discretion orders the consolidation of the contempt charge and the principal action for joint hearing and decision.¹

5. In *Masakazu Uemasu vs. Alma N. Balinon*², this Honorable Court thoroughly explained that:

“In *Arriola, et al. v. Arriola (Arriola)*, **the Court emphasized that the indirect contempt, not initiated by the court motu proprio, must be commenced by a verified petition.** It ratiocinated that even if the contempt proceedings emanated from a principal case, still, the governing rules require that a petition be filed and treated independently of the main action. It stressed that it is beyond doubt that the requirement of a verified petition in initiating an indirect contempt proceeding is a mandatory requirement quoting the Court's earlier pronouncement in *Regalado v. Go, viz.:*

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“Henceforth, except for indirect contempt proceedings initiated *motu proprio* by order of or a formal charge by the offended court, all charges shall be commenced by a verified petition with full compliance with the requirements therefore and shall be disposed in accordance with the second paragraph of this section.

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“Even if the contempt proceedings stemmed from the main case over which the court already acquired jurisdiction, the rules direct that the petition for contempt be treated independently of the principal action. Consequently, the necessary prerequisites for the filing of initiatory pleadings, such as the filing of a verified petition, attachment of a certification on non-forum shopping, and the payment of the necessary docket fees, must be faithfully observed. (Emphasis in the original; footnotes omitted.)”³

6. In *Aquino vs. Ng, G.R. No. 155631, July 27, 2007*, this Court explained that “in all other cases (aside from those initiated *motu proprio* by the court), charges for indirect contempt shall be

¹ Emphasis and underscoring ours.

² G.R. No. 234812, November 25, 2019.

³ Emphasis and underscoring ours.

commenced by a verified petition with supporting particulars **and certified true copies of documents or papers involved therein**, *and upon full compliance with requirements for filing initiatory pleadings for civil actions in the court concerned.*”

7. Here, respondent P3PWD prayed that petitioners Topacio and Cardema be cited in contempt not through a verified petition but on their mere compliance to the Resolution of this Honorable Court and without *full compliance with the requirements for filing initiatory pleadings*. This is clearly contrary to what was prescribed by the rules and jurisprudence cited above.

8. In fact, not only did respondent P3PWD fail to file a verified petition, it also failed to attach the necessary **certification on non-forum shopping** and to show proof of payment of **docket fees**. This manifest error from the respondent is fatal to their cause since the rules are clear and specific that a petition for contempt must be treated independently from the main action.

9. Therefore, it is only proper that the prayer for contempt be disregarded as nothing but a poor attempt by the respondent P3PWD to get back at petitioners in filing this case against them.

10. The rationale for the Rule is not difficult to discern: the Rules require a verified petition to filter out frivolous prayers for contempt, by requiring that the petition be under oath, separately filed and the corresponding docket fees paid. This is to ensure that any person wishing to cite a party (or anyone for that matter) in contempt is serious in his endeavor by requiring, not only that it be in a separate petition, but that fees be paid therefor and, most importantly, that it be under oath, so that in case the complaint for contempt is later found out to be merely vexatious, then the complainant may be proceeded against by the person complained of. If it were otherwise, what is to stop a party from initiating even baseless and unfounded motions to cite others in contempt when there will be no consequences should the petition be found to be groundless and meant merely to harass.

11. This safeguard finds greater relevance and application in the case of respondent Guanzon because of her demonstrable propensity for filing groundless suits. In *Guanzon v. Dojillo* (August 6, 2018 A.C. No. 9850, this Honorable Court held that --

“The IBP-CBD also opined that **Atty. Guanzon's successive filing of cases against Garcia gives the impression that she merely wanted to overwhelm Garcia with several cases and exhaust his**

resources in order to get back at him for filing the disbarment case against her.

“It likewise noted that in the unjust vexation case which Atty; Guanzon filed against Garcia, entitled *People of the Philippines v. Jesus Chua Garcia*, docketed as Criminal Case No. 06-10-12695, the MTCC, Branch 6, Bacolod City, **similarly believed that Atty. Guanzon filed several cases against Garcia merely in retaliation for the latter’s filing of disbarment case against her. The IBP-CBD, thus, further recommended that Atty. Guanzon be censured for filing harassment and baseless suits.**

“In Resolution No. XVIII-2008-645 dated December 11, 2008, the IBP-Board of Governors adopted and approved with modification the report and recommendation of the Investigating Commissioner to dismiss the complaint against Atty. Dojillo due to insufficiency of evidence. **It further resolved to warn Atty. Guanzon to refrain from filing groundless complaints.**

“Atty. Guanzon moved for reconsideration, but the same was denied by the IBP-Board of Governors in Resolution No. XX-2013-12 dated January 3, 2013. It likewise affirmed the Resolution No. XVIII-2008-645 dated December 11, 2008.

Thus, on April 10, 2013, Atty. Guanzon filed the instant petition for review of IBP Resolution No. XX-2013-12.

RULING

“The Court adopts the findings and recommendation of the Investigating Commissioner and the IBP Board of Governors.”
(Emphasis ours)

There is no imputation against Ducielle Marie Cardema. Besides, as to Duterte Youth, it is a juridical person.

12. Petitioner Duterte Youth is an artificial person. It is a Party List duly registered with the respondent COMELEC under the law. Hence, it can only act through its authorized representatives. This is

hornbook doctrine that makes it legally impossible to cite Duterte Youth for contempt. As to former Rep. Ducielle Marie Cardema, there are no imputations of her having uttered anything publicly in relation to this case anywhere in the compliance.

Mr. Cardema did not violate the sub judice rule.

13. Granting without admitting that the transcriptions of Mr. Cardema's alleged statements, as quoted in the respondents' Compliance are correct, *although they are not authenticated as required for an initiatory pleadings*, Mr. Cardema was simply restating petitioners' arguments in their Petition to the reporters who were asking about the details thereof.

14. This mere re-statement of their arguments to the press was not made with an intention to impede and embarrass the administration of justice and erode public confidence on the courts, contrary to the allegation of respondent P3PWD. Rather, it was petitioner's civic duty to inform the public of the nature of the Petition considering that the parties involved are public figures and the issue is of transcendental importance since it affects the general public and the composition of its representative in congress.

15. In *Marantan vs. Diokno*⁴, this Honorable Court held:

“The mere restatement of their argument in their petition cannot actually, or does not even tend to, influence the Court.”

16. Since this case is of transcendental importance, as it deals with the manner and procedure in substitution in the party-list sector, respondent P3PWD has the burden to prove that it was petitioner's ***intention*** to violate the *sub judice* rule in making those press conference.

17. In *Marantan, supra*, it was made clear that: “[t]he proceedings for punishment of indirect contempt are criminal in nature... Intent is a necessary element in criminal contempt, and no one can be punished for a criminal contempt unless the evidence makes it clear that he intended to commit it. For a comment to be considered as contempt of court "it must really appear" that such does impede, interfere with and embarrass the administration of justice”.

18. Moreover, this Honorable Court held that “contempt is not presumed. In proceedings for criminal contempt, the defendant

⁴ G.R. No. 205956, February 12, 2014.

is presumed innocent and the burden is on the prosecution to prove the charge beyond reasonable doubt.”⁵

“The power of contempt is inherent in all courts in order to allow them to conduct their business unhampered by publications and comments which tend to impair the impartiality of their decisions or otherwise obstruct the administration of justice. As important as the maintenance of freedom of speech, is the maintenance of the independence of the Judiciary. The ‘clear and present danger’ rule may serve as an aid in determining the proper constitutional boundary between these two rights.

“The ‘clear and present danger’ rule means that the evil consequence of the comment must be ‘extremely serious and the degree of imminence extremely high’ before an utterance can be punished. There must exist a clear and present danger that the utterance will harm the administration of justice. Freedom of speech should not be impaired through the exercise of the power of contempt of court unless there is no doubt that the utterances in question make a serious and imminent threat to the administration of justice.

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“As to the merits, the comments seem to be what the respondents claim to be an expression of their opinion that their loved ones were murdered by Marantan. This is merely a reiteration of their position in G.R. No. 199462, which precisely calls the Court to upgrade the charges from homicide to murder. The Court detects no malice on the face of the said statements. **The mere restatement of their argument in their petition cannot actually, or does not even tend to, influence the Court.**

XXX

"A public utterance or publication is not to be denied the constitutional protection of freedom of speech and press merely because it concerns a judicial proceeding still pending in the courts, upon the theory that in such a case, it must necessarily tend to obstruct the orderly and fair administration of justice. By no stretch of the imagination could the respondents' comments pose a serious and imminent threat to the administration of justice. No

⁵Harbourt Center Port Terminal, Inc. vs. La Filipina Uygongco Corp., G.R. No. 240984 & 241120, September 17, 2021.

criminal intent to impede, obstruct, or degrade the administration of justice can be inferred from the comments of the respondents.

“Freedom of public comment should, in borderline instances, weigh heavily against a possible tendency to influence pending cases. The power to punish for contempt, being drastic and extraordinary in its nature, should not be resorted to unless necessary in the interest of justice. In the present case, such necessity is wanting.”⁶

19. The above principle, we are confident, is recognized by this Honorable Court because even in the instructions of the Honorable Senior Associate Justice Marvic Leonen during the pre-trial of this case, it was made clear to the parties that while they should not discuss the instant case with media henceforth, the records will bear out that –if memory serves -- he allowed the parties and/or their counsels to talk to media after the oral arguments but only to the extent that they may reiterate the arguments made during the said arguments without going into the merits. This is a testament to the latitudinarian attitude given by the Honorable Court to freedom of expression.

20. In contrast, the allowable exercise of free speech as elucidated above is a far cry from the actuations of respondent Guanzon in casting shadows over the wisdom, power and authority of this Honorable High Court in her several interviews, wherein she actually delved into the merits of the case. Such acts tend to bring disrepute unto the High Court, for which she was correctly called out by the High Tribunal *ex proprio vigore*.

20.1. For instance, as admitted by respondent Guanzon in page 8 to 9 of her compliance, she stated categorically that “the right and the law is on my side”, adding a detailed discussion of the law and even berating the interviewer who disagreed with her by saying, “why are you adding to the law?” Even worse, on page 10, she directly questioned the jurisdiction of the Supreme Court **two (2) days after the filing of the Petition on 21 June 2022 (which filing was given very wide media coverage because of its nature and the personalities involved)**, going so far as saying “**how can the Supreme Court restrain an act of the COMELEC that is already done? In my opinion xxx the issue now should be before the HRET. xxx No longer with the COMELEC.**” The interview even contained a clear intent not to obey any injunctive order the Supreme Court may issue: “**On Monday, I will receive my pin as member of Congress.**” These statements she repeated time and again in interviews, and even in her social media platforms.

⁶*Marantan, supra.*

Mr. Cardema did not willfully misquotethe Honorable Court

21. Respondent P3PWD alleges that petitioner Ronald Cardema misquoted the TRO by insinuating that the House of Representatives was ordered not to allow Rowena Guanzon to assume as congresswoman. Petitioner Ronald Cardema should not be punished for this.

22. To begin with, Mr. Cardema is simply a layman voicing out in good faith his non-technical understanding of the TRO. It is unfair that respondent P3PWD now comes to this Honorable Court accusing Ronald Cardema of deliberately misquoting the TRO and arguing that that the cited cases of *Commission on Elections vs. Hon. Tomas B. Nonay*⁷ and *Allied Banking Corporation vs. Court of Appeals*⁸, applies to him and Atty. Ferdinand Topacio.

23. In those two cases cited by respondent P3PWD, the party being admonished by this Honorable Court are both lawyers, who were found to have either deliberately or imprudently **misquotedcase law.**

24. Thus, in *Nonay, supra*, this Court held that –

“If Atty. Balbuena was diligent enough, he would have known that the correct name of the complainant in the case referred to is neither *Alberto Naldeza* as indicated in the motion for reconsideration nor *Alberto* alone as stated in the petition, but ALBERTO NALDOZA. Moreover, the case was not reported in volume 245 of the Supreme Court Reports Annotated (SCRA) as falsely represented in the paragraph 16 of the petition, but in volume 254 of the SCRA.

“Worse, in both the motion for reconsideration and the petition, Atty. Balbuena deliberately made it appear that the quoted portions were findings or rulings, or, put a little differently, our own words. The truth is, the quoted portion is just a part of the memorandum of the Court Administrator quoted in the decision.

“Rule 10.02 of Canon 10 of the Code of Professional Responsibility mandates that a lawyer shall not knowingly misquote or misrepresent the text of a decision or authority.

⁷ G.R. No. 132365, July 09, 1998.

⁸ G.R. No. 144412, November 18, 2023.

“IN VIEW OF ALL THE FOREGOING, the instant petition is GRANTED. The challenged orders of public respondent Judge Tomas B. Noynay of 25 August 1997 and 17 October 1997 in Criminal Cases Nos. A-1439 and A-1442 to A-1449 are SET ASIDE. Respondent Judge is DIRECTED to try and decide said cases with purposeful dispatch and, further, ADMONISHED to faithfully comply with Canons 4 and 18 of the Canons of Judicial Ethics and Rule 3.01, Canon 3 of the Code of Judicial Conduct.

“Atty. Jose P. Balbuena is ADMONISHED to be more careful in the discharge of his duty to the court as a lawyer under the Code of Professional Responsibility.”⁹

25. In the same vein was the holding in *Allied Banking Corporation, supra*, which is in this wise:

“The memorandum prepared by Atty. Durano and, worse, the assailed Decision of the Labor Arbiter, both **misquoted** the Supreme Court’s ruling in **Dosch v. NLRC**. The Court held in *Dosch*:

‘We cannot agree to Northwest’s submission that petitioner was guilty of disobedience and insubordination which respondent Commission sustained. The only piece of evidence on which Northwest bases the charge of contumacious refusal is petitioner’s letter dated August 28, 1975 to R.C. Jenkins wherein petitioner acknowledged receipt of the former’s memorandum dated August 18, 1975, appreciated his promotion to Director of International Sales but at the same time regretted “that at this time for personal reasons and reasons of my family, I am unable to accept the transfer from the Philippines” and thereafter expressed his preference to remain in his position, saying: “I would, therefore, prefer to remain in my position of Manager-Philippines until such time that my services in that capacity are no longer required by Northwest Airlines.” From this evidence, We cannot discern even the slightest hint of defiance, much less imply insubordination on the part of petitioner.’

“The phrase ‘[r]efusal to obey a transfer order cannot be considered insubordination where employee cited

⁹Footnote omitted.

reason for said refusal, such as that of being away from the family' does not appear anywhere in the *Dosch* decision. **Galanida's counsel lifted the erroneous phrase from one of the italicized lines in the syllabus of *Dosch* found in the Supreme Court Reports Annotated ("SCRA").**

"The syllabus of cases in official or unofficial reports of Supreme Court decisions or resolutions is not the work of the Court, nor does it state this Court's decision. The syllabus is simply the work of the reporter who gives his understanding of the decision. The reporter writes the syllabus for the convenience of lawyers in reading the reports. A syllabus is not a part of the court's decision. **A counsel should not cite a syllabus in place of the carefully considered text in the decision of the Court.**

"In the present case, Labor Arbiter Almirante and Atty. Durano began by quoting from *Dosch*, but substituted a portion of the decision with a headnote from the SCRA syllabus, which they even underscored. **In short, they deliberately made the quote from the SCRA syllabus appear as the words of the Supreme Court.** We admonish them for what is at the least patent carelessness, if not an outright attempt to mislead the parties and the courts taking cognizance of this case. Rule 10.02, Canon 10 of the Code of Professional Responsibility mandates that a lawyer shall not knowingly misquote or misrepresent the text of a decision or authority. It is the duty of **all officers of the court** to cite the rulings and decisions of the Supreme Court accurately."¹⁰

Mr. Cardema's statements are protected by the fundamental right to freedom of speech and expression.

26. In *Roque, Jr. vs Armed Forces of the Philippines Chief of Staff*¹¹, this Honorable Court held that:

"This Court will not freely infringe on the constitutional right to freedom of expression. It may interfere, on occasion, for the proper administration of

¹⁰Footnotes omitted; Emphasis ours.

¹¹ G.R. No. 214986, February 15, 2017.

justice. However, the power of contempt should be balanced with the right to freedom of expression, especially when it may have the effect of stifling comment on public matters. Freedom of expression must always be protected to the fullest extent possible.”

27. In this case, Mr. Cardema respectfully submits that his statements were made in the valid exercise of his right to free speech on matters of public concern. In determining the constitutional boundary between freedom of speech and that of judicial independence, this Honorable Court, in *Marantan, supra*, has used the *clear and present danger* test as a guide.

28. The clear and present danger test “means that the evil consequence of the comment or utterance must be “extremely serious and the degree of imminence extremely high” before the utterance can be punished”¹². Here, the public utterance complained of by respondent P3PWD has been well settled by jurisprudence as lawful since they are mere restatement of the arguments in their petition.

Atty. Topacio did not assist nor consent in violating the sub judice rule and misquoting the Court’s TRO.

29. Likewise, it is quite a stretch of imagination for respondent P3PWD to accused Atty. Ferdinand Topacio of assisting petitioners in this case on their alleged acts of violation of *sub judice rule* and misquoting the TRO.

30. To set the record straight, if there is a party with an ill intent to impede and embarrass the administration of justice and erode public confidence on the courts, it is respondent P3PWD for clearly making misleading and unsubstantiated allegations against Atty. Ferdinand Topacio.

31. In the press conferences mentioned by respondent P3PWD, it is undeniable that Atty. Ferdinand Topacio was simply seen beside petitioner Ronald Cardema. This act cannot, in anyway, be considered as an assistance to the actions of another person as Atty. Topacio has no complete control over the acts of his clients.

32. It is highly improper for respondent P3PWD to unjustly conclude that Atty. Topacio assisted in misleading the public without proof other than their unfounded inferences. Their position flies in

¹²Cabansag vs. Fernandez et al, G.R. No. L-8974, October 18, 1957.

the face of the legal truism that “the proceedings for punishment of indirect contempt are criminal in nature” as aforesaid.

PRAYER

WHEREFORE, it is respectfully prayed of this Honorable Court that the prayer of the respondents to cite in contempt the *Duterte Youth Party-List Represented By Chairman Ronald Gian Carlo L. Cardema and Representative Ducielle Marie S. Cardema, and Atty. Ferdinand S. Topaciobe DENIED for UTTER LACK OF MERIT.*

Other reliefs just and equitable are likewise prayed for.

October 18, 2023. City of Pasig for City of Manila.




TOPLAW

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PTR No. 3133478/1.18.23/Mandaluyong
MCLE Compliance No. VII-0018724
Issued on 25 May 2022



EDWARD CONFIADO SANTIAGO

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IBP Lifetime No. 16499/ 05.10.17/ Manila III

PTR No. MKT-9566370/ 01.03.23/ Makati City


MCLE Compliance No. VII - 0017464/ 05.10.22

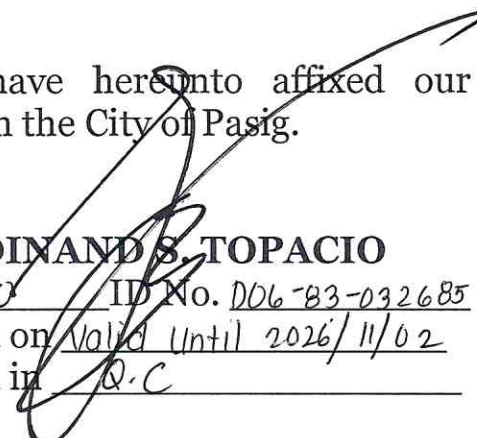
VERIFICATION

WE, RONALD GIAN CARLO L. CARDEMA and FERDINAND S. TOPACIO, under oath, jointly depose as follows:


1. We have caused the preparation of the present Comment;
2. We have read the same and the allegations therein are true and correct based on our personal knowledge and authentic documents;
3. The said comment is not filed to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
4. The factual allegations therein have evidentiary support or will likewise have evidentiary support after a reasonable opportunity for discovery.

IN WITNESS WHEREOF, we have hereunto affixed our signatures this 18th day of October 2023 in the City of Pasig.


RONALD GIAN CARLO L. CARDEMA
 UMID ID No. 0111-8720894-4
 Issued on _____
 Issued in _____


FERDINAND S. TOPACIO
 LTO ID No. DD6-B3-032685
 Issued on Valid Until 2026/11/02
 Issued in P.C

SUBSCRIBED AND SWORN to before me this 18th day of October 2023, affiants exhibiting to me their respective proofs of identity as aforementioned, bearing their photographs and signatures, hence, proving their identity to my satisfaction.


GAUDENCIO A. BARBOZA, JR.
NOTARY PUBLIC
 Cities of Pasig, San Juan and
 in the Municipality of Pateros, Metro Manila
 Until December 31, 2024
 PTR No. 0112601 / 01/03/2023 Pasig City
 IBP No. 248416 / 10/06/2022 For Year 2023/ RSM
 Roll No. 41969
 MCLE Comp. VII-0028557/April 19, 2023
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 Shaw Blvd. Brgy. San Antonio, Pasig City
 Appointment No. 61 (2023-2024)

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VERIFIED DECLARATION

I, EDWARD C. SANTIAGO, Filipino, of legal age and with office address at Topacio Law Office, Unit 107 Skyway Twin Towers, H. Javier St., Oranbo, Pasig City, hereby declare that a copy of this Comment to be submitted electronically (by e-mail) within 24 hours from the filing of its hard copy, in accordance with the Efficient Use of Paper Rule is a complete and true copy of that filed personally with the Supreme Court.


Pasig City, 18 October 2023.



EDWARD C. SANTIAGO
Senior Associate
Topacio Law Office

SUBSCRIBED and sworn to before me on this 18th day of October, 2023 affiant exhibiting his competent evidence of identity to wit: IBP Identification Card 70205 bearing his photograph and signature, hence proving his identity.

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GAUDENCIO A. BARBOZA, JR.
NOTARY PUBLIC
Office in Pasig, Carriedan and
in the Municipality of Pateros, Metro Manila
Until December 31, 2024
PTR No. 0112601 /01/03/2023 Pasig City
IBP No. 248416 / 10/06/2022 For Year 2023/ RSM
Roll No. 41069
MCLE Comp. VII-0026557/April 19, 2023
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