



Republic of the Philippines
Supreme Court
Manila

SUPREME COURT OF THE PHILIPPINES
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THIRD DIVISION

In the Matter of the Petition for Habeas Corpus for Ryanh M. Dolor G.R. No. 279692
Present:

WENDAH KATRINA RIVERA CAGUIOA, J., Chairperson,
DOLOR, INTING,
Petitioner, GAERLAN,
DIMAAMPAO, and
SINGH,* JJ.

- versus -

HOUSE OF
REPRESENTATIVES
COMMITTEE ON PUBLIC
ACCOUNTS, represented by
HON. JOSEPH STEPHEN S.
PADUANO, Chairman of the
House of Representatives
Committee on Public Accounts,
CONG. FERDINAND MARTIN
G. ROMUALDEZ, in his
capacity as Speaker of the House
of Representatives, and PMGEN
NAPOLEON C. TAAS (Ret.), in
his capacity as House of
Representatives Sergeant-at-
Arms, and/or any and all persons
who may have actual custody
over the person of Ryanh M.
Dolor,

Respondents.

Promulgated:

JUN 11 2025

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* On leave.

M

DECISION

INTING, J.:

Before the Court is a Petition for *Habeas Corpus* with Urgent Motion for Special Raffle¹ (Petition) seeking the issuance of a writ of *habeas corpus* directing the release and/or discharge of Ryanh M. Dolor (Mayor Dolor), who was cited in contempt by respondent House of Representatives (House) Committee on Public Accounts.

The Antecedents

In House Resolution No. 2148,² the House of Representatives of the Nineteenth (19th) Congress directed the Committee on Public Accounts (House Committee) to conduct an inquiry, in aid of legislation, into the alleged misuse of public funds and properties and the purported irregularities in the operations of the Office of the Mayor and Vice Mayor of the Municipality of Bauan, Batangas.

House Resolution No. 2148 pertained to alleged anomalies in the privatization of the Bauan Waterworks System (BWS). Purportedly, there were irregularities in the bidding process concerning a management contract for the privatization of BWS, which was awarded to an entity that allegedly failed to meet certain legal and financial qualifications. The House Resolution also referred to irregularities in the privatization and/or lease of a parcel of land for the construction of the Bauan Plaza Hotel.

In view of the gravity of the foregoing allegations and the need for legislative measures to prevent similar irregularities, the House directed the conduct of an inquiry in aid of legislation. As stated in House Resolution No. 2148, the objective of the inquiry is to identify legislative gaps in the government procurement and privatization process and to propose legislative measures concerning local government transactions, among others, to wit:

NOW, THEREFORE, BE IT RESOLVED, as it is hereby resolved, that the House of Representatives directs the Committee on Public Accounts and other appropriate committees to conduct an inquiry, in

¹ *Rollo*, pp. 3-25.

² *Id.* at 99-101.

aid of legislation, into the alleged misuse of public funds and properties, and irregularities in the operations of the Office of the Mayor of the Municipality of Bauan, Batangas under Mayor Rynah M. Dolor;

BE IT FURTHER RESOLVED, that the inquiry aims to:

1. Investigate the misuse of public funds and properties, anomalies in the privatization of the Bauan Waterworks System, and other irregularities committed by the Office of the Mayor of Bauan, Batangas;
2. Determine the accountability of Mayor Rynah M. Dolor and other individuals involved;
3. Identify legislative gaps in existing laws governing procurement, privatization, and local government operations;
4. Institute the appropriate legal remedies and sanctions following the determination of accountability of Mayor Rynah M. Dolor and other individuals involved; and
5. Propose legislative measures to strengthen transparency, accountability, and oversight mechanisms in local government transactions and to safeguard public resources.³ (Emphasis in the original)

The House Committee acted upon House Resolution No. 2148 by issuing a letter⁴ dated January 21, 2025 to Mayor Dolor, the incumbent Mayor of the Municipality of Bauan, Batangas. In the letter, the House Committee requested the attendance of Mayor Dolor in the initial hearing scheduled on January 27, 2025.

In a letter⁵ dated January 22, 2025, Mayor Dolor informed the House Committee that he would be unable to attend the January 27, 2025 hearing due to prior commitments as the incumbent Mayor of Bauan, Batangas. He averred that he had several wedding ceremonies to officiate on the day of the hearing.⁶

The House Committee responded to Mayor Dolor through a letter⁷ dated January 31, 2025, wherein it noted his absence during the initial hearing held on January 27, 2025. It requested the attendance of Mayor Dolor in the next hearing scheduled on February 5, 2025. It further

³ *Id.* at 100–101.

⁴ *Id.* at 28–29.

⁵ *Id.* at 30.

⁶ *Id.*

⁷ *Id.* at 31–32.

requested Mayor Dolor to produce copies of several documents related to the bidding process for the privatization of BWS and the construction of Bauan Plaza Hotel.

Mayor Dolor did not attend the February 5, 2025 House Committee hearing.⁸ The House Committee thus issued a Show Cause Order⁹ to Mayor Dolor, directing him to provide a written explanation on the following: (1) his absence during the February 5, 2025 hearing; and (2) why he should not be cited in contempt under Section 11¹⁰ of the Rules of Procedure Governing Inquiries in Aid of Legislation of the House of Representatives of the 19th Congress (House Rules for Legislative Inquiries).

On the same day or on February 5, 2025, the House of Representatives adjourned its session.¹¹

In a letter¹² dated February 12, 2025, Mayor Dolor explained that he was unable to attend the February 5, 2025 House Committee hearing due to his poor health and hospital confinement. Supposedly, he was advised by his doctor to refrain from prolonged travel and stressful engagements. In support of his assertion, Mayor Dolor attached a Medical Certificate¹³ dated February 4, 2025, which states that on February 3, 2025, he was admitted to Cardinal Santos Hospital due to chest pains. He alleged that he was confined at the hospital until February 8, 2025.¹⁴

⁸ *Id.* at 10.

⁹ *Id.* at 34.

¹⁰ SECTION 11. *Contempt.* – The committee may punish any person for contempt, by a vote of two-thirds (2/3) of the Members present, there being a quorum. The following shall be grounds for citing any person in contempt:

- a. refusal without legal excuse to obey summons;
- b. refusal to be sworn or placed under affirmation;
- c. refusal to answer any relevant inquiry;
- d. refusal to produce any books, papers, documents or records that are relevant to the inquiry and are in the possession of the concerned person;
- e. acting in a disrespectful manner towards any Member of the committee or any misbehavior in the presence of the committee; or
- f. undue interference in the conduct of proceedings.

Contempt of the committee shall be deemed contempt of the House. The person cited in this section may, upon order of the committee, be detained in such place as the Chairperson or acting Chairperson may designate.

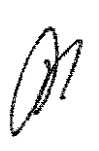
¹¹ *Rollo*, p. 10, *citing*

<https://www.congress.gov.ph/media/view/?content=5778&title=HOUSE+ADJOURNS+SESSION+AHEAD+OF+MAY+2025+MIDTERM+POLLS> [Last accessed on June 11, 2025].

¹² *Id.* at 35.

¹³ *Id.* at 33, Medical Certificate dated February 4, 2025.

¹⁴ *Id.* at 10.



Thereafter, the House Committee wrote a letter¹⁵ dated February 18, 2025 to Mayor Dolor, wherein it requested his attendance in the hearing scheduled on February 26, 2025. In a letter¹⁶ dated February 24, 2025, Mayor Dolor informed the House Committee of his inability to attend the scheduled hearing because of serious health episodes involving high blood pressure and hypertensive heart disease. He mentioned that he will be travelling to Singapore for a comprehensive medical check-up, rendering him unable to attend the Committee hearing.

Mayor Dolor was again invited to attend a House Committee hearing scheduled on March 17, 2025, through the *Subpoena Ad Testificandum*¹⁷ dated March 11, 2025, signed by House Committee Chairperson Joseph Stephen S. Paduano (Chairperson Paduano) and Speaker of the House Ferdinand Martin G. Romualdez. In a letter¹⁸ dated March 13, 2025, Mayor Dolor informed the House Committee of his inability to attend the hearing due to his poor medical condition. He also informed the House Committee that he was granted the Authority to Travel¹⁹ to the United States (US) from March 11, 2025 to March 26, 2025. According to Mayor Dolor, his travel to the US was for medical care and treatment.²⁰

On March 17, 2025, the House Committee, upon the unanimous vote of its members then present and while in a quorum, issued against Mayor Dolor a Contempt and Detention Order,²¹ which was signed by Chairperson Paduano. It noted the absence of Mayor Dolor during the hearing held on said date. It ruled that Mayor Dolor refused, without legal excuse, to obey the House Committee's summons. It thus cited Mayor Dolor in contempt and directed his detention at the House's facility until the termination of the legislative inquiry pursuant to Section 11(a) of the House Rules for Legislative Inquiries.

On March 18, 2025, Mayor Dolor filed his Motion for Reconsideration of the Contempt and Detention Order.²²

¹⁵ *Id.* at 36-37.

¹⁶ *Id.* at 38.

¹⁷ *Id.* at 39.

¹⁸ *Id.* at 40.

¹⁹ *Id.* at 41.

²⁰ *Id.* at 11.

²¹ *Id.* at 26.

²² *Id.* at 11.

On March 27, 2025, Mayor Dolor was arrested by the Sergeant-at-Arms of the House and was brought to the latter's detention facility. On March 29, 2025, while under detention, Mayor Dolor experienced dizziness and thus requested his immediate referral to a medical facility.²³ He experienced similar symptoms on March 31, 2025.²⁴

On April 10, 2025, the House Committee denied Mayor Dolor's Motion for Reconsideration of the Contempt and Detention Order. However, it noted that Mayor Dolor appeared to be suffering from cardiomyopathy—a serious condition that may lead to a heart attack if not properly addressed. It thus ruled that Mayor Dolor shall remain confined at a hospital to ensure his continued medical care while remaining under the supervision and jurisdiction of the Office of the Sergeant-at-Arms of the House.²⁵

Hence, the present Petition.

Petitioner's Arguments

On a procedural matter, petitioner Wendah Katrina Rivera Dolor (petitioner), the legal spouse of Mayor Dolor, avers that the Petition was directly filed with the Court in the higher interest of justice, given the continuing illegal detention of Mayor Dolor and the violation of his constitutional right to due process.

On the merits, petitioner avers that the House Committee acted with grave abuse of discretion when it cited Mayor Dolor in contempt and ordered his detention upon the following arguments:

First, the Contempt and Detention Order is void because it was not signed by the Speaker of the House, contrary to Rule IV, Section 15(j) of the Rules of the House of Representatives of the 19th Congress (Rules of the House of the 19th Congress), which states that the Speaker of the House shall "sign all acts, resolutions, memorials, writs, warrants and *subpoenae* that may be issued by or upon order of the House."²⁶

²³ *Id.*

²⁴ *Id.* at 12.

²⁵ *Id.* at 98.

²⁶ *Id.* at 17–18.

Second, the House Rules for Legislative Inquiries does not provide for any rule or guideline in the arrest of a person who has been cited in contempt.²⁷ The House Committee, in ordering the arrest of Mayor Dolor, exceeded its authority because under Article III, Section 2²⁸ of the 1987 Constitution, a person may be arrested based only on the strength of a judicial warrant.²⁹

Third, the detention of Mayor Dolor was not in aid of legislation but is purely politically motivated. Despite the alleged irregularities in relation to the privatization of BWS and the construction of the Bauan Plaza Hotel, the Municipality of Bauan, Batangas, received the Seal of Good Governance Award in 2023.³⁰ Moreover, Mayor Dolor was arrested on March 27, 2025, when the House had already adjourned, thus confirming that his detention was not in aid of legislation.³¹

Fourth, under Section 12³² of the House Rules for Legislative Inquiries, a person who has been cited in contempt may only be detained for a period not exceeding 10 days. Mayor Dolor's detention is illegal because it exceeded the 10-day limitation set forth in Section 12.³³

Finally, the Contempt and Detention Order is violative of Article VI, Section 21³⁴ of the 1987 Constitution, which states that the rights of persons appearing in or affected by inquiries in aid of legislation shall be respected. The House Committee cited Mayor Dolor in contempt even though his absence during the March 17, 2025 hearing was due to a justifiable cause, i.e., his poor health.³⁵

²⁷ *Id.* at 18.

²⁸ SECTION 2. The right of the people to be secure in their persons, houses, papers, and effects against unreasonable searches and seizures of whatever nature and for any purpose shall be inviolable, and no search warrant or warrant of arrest shall issue except upon probable cause to be determined personally by the judge after examination under oath or affirmation of the complainant and the witnesses he may produce, and particularly describing the place to be searched and the persons or things to be seized.

²⁹ *Rollo*, pp. 19–21.

³⁰ *Id.* at 16–17.

³¹ *Id.* at 21.

³² SECTION 12. *Penalty.* – By a vote of two-thirds (2/3) of the Members present, there being a quorum, those cited under Section 11, paragraphs (e) and (f) shall be detained for a period not exceeding ten (10) days in a place designated by the Chairperson or Acting Chairperson under the custody of the Sergeant-at-Arms.

³³ *Rollo*, pp. 15–16.

³⁴ SECTION 21. The Senate or the House of Representatives or any of its respective committees may conduct inquiries in aid of legislation in accordance with its duly published rules of procedure. The rights of persons appearing in or affected by such inquiries shall be respected.

³⁵ *Rollo*, p. 15.



Respondents' Arguments

In their Compliance,³⁶ respondents, through the Office of the Solicitor General (OSG), seek the denial of the Petition upon the following arguments:

First, the Petition improperly raises factual issues and is violative of the doctrine of hierarchy of courts. Petitioner did not provide any justifying circumstances that could warrant the relaxation of the rules of procedure.³⁷

Second, the inquiry being conducted by the House Committee is in aid of legislation. As clearly set forth in House Resolution No. 2148, the inquiry has a legislative agenda concerning the identification of gaps in existing laws and the enactment of legislative measures on procurement, privatization, and local government operations.³⁸

Third, the Contempt and Detention Order was validly issued because Mayor Dolor failed to attend the House Committee hearing on March 17, 2025 without sufficient explanation. The excuses proffered by Mayor Dolor are unsupported by medical records, laboratory results, and other relevant documents.³⁹

Fourth, Chairperson Paduano was authorized to sign the Contempt and Detention Order. The House Rules for Legislative Inquiries does not require the signature or approval of the Speaker of the House for contempt orders issued by a House committee.⁴⁰

Finally, Mayor Dolor's arrest was valid because he was properly cited in contempt by the House Committee. In *Ong v. Senate of the Philippines*,⁴¹ the power of the Legislature to order the arrest of a contemner was expressly recognized by the Court. Such power to cite a person in contempt and to order their arrest, as an incident of the

³⁶ *Id.* at 122–146. The Compliance was filed in relation to the Court's Resolution dated May 7, 2025 (*id.* at 118–121), which directed respondents to show cause within a non-extendible period of 10 days from notice why a peremptory writ of *habeas corpus* should not be issued.

³⁷ *Id.* at 131–133.

³⁸ *Id.* at 134–136.

³⁹ *Id.* at 136–139.

⁴⁰ *Id.* at 139–140.

⁴¹ 938 Phil. 929 (2023).

legislative authority of the House, continued even while the Congress was in recess or adjournment.⁴²

The Issues

The issues before the Court are as follows:

- I. Whether the Petition was properly filed at the first instance with the Court.
- II. Whether the confinement or detention of Mayor Dolor is unconstitutional or illegal.
 1. Whether the inquiry being conducted by the House Committee is in aid of legislation.
 2. Whether the Contempt and Detention Order is void for having been issued without the signature of the Speaker of the House.
 3. Whether the House Committee could validly cite Mayor Dolor in contempt and order his arrest while the House was in adjournment.
 4. Whether the arrest of Mayor Dolor is unconstitutional for having been effected without a judicial warrant.
 5. Whether the House Committee violated the constitutional right of Mayor Dolor to due process when it cited him in contempt despite his health condition.
 6. Whether the detention of Mayor Dolor for a period of more than 10 days is contrary to the House Rules for Legislative Inquiries.

The Ruling of the Court

The Petition is dismissed for failure to observe the hierarchy of courts and for lack of merit.

⁴² *Rollo*, pp. 142-144.



I. *The Petition is violative of the doctrine of hierarchy of courts*

Procedurally, the Petition is immediately dismissible for being violative of the doctrine of hierarchy of courts.

Under Article VIII, Section 5(1)⁴³ of the 1987 Constitution and Sections 9(1)⁴⁴ and 21(1)⁴⁵ of Batas Pambansa Blg. 129, as amended by Republic Act No. 7902,⁴⁶ the Court, the Court of Appeals, and the Regional Trial Courts have *concurrent* jurisdiction over petitions for *habeas corpus*.⁴⁷ Pursuant to the principle of hierarchy of courts, the present Petition should have been filed with the lowest court with jurisdiction, i.e., the appropriate regional trial court. The non-observance of this elementary rule is sufficient for the outright dismissal of the Petition.⁴⁸

Petitioner invokes the higher interest of justice in directly filing the present Petition with the Court. She avers that the House Committee acted with manifest arbitrariness and disregard of the constitutional rights of Mayor Dolor when it cited him in contempt. She adds that time is of the essence because the issues raised in the present Petition concerning the authority of the House Committee to order Mayor Dolor's arrest without a judicial warrant must be resolved with finality by the Court.⁴⁹

However, a bare invocation of substantial justice is insufficient for the Court to relax the rules of procedure.⁵⁰ Petitioner should have

⁴³ SECTION 5. The Supreme Court shall have the following powers:

(1) Exercise original jurisdiction over cases affecting ambassadors, other public ministers and consuls, and over petitions for certiorari, prohibition, mandamus, quo warranto, and habeas corpus.

⁴⁴ SECTION 9. *Jurisdiction*. – The Court of Appeals shall exercise:

(1) Original jurisdiction to issue writs of mandamus, prohibition, certiorari, habeas corpus, and *quo warranto*, and auxiliary writs or processes, whether or not in aid of its appellate jurisdiction[.]

⁴⁵ SECTION 21. *Original jurisdiction in other cases*. – Regional Trial Courts shall exercise original jurisdiction:

1. In the issuance of writs of *certiorari*, prohibition, *mandamus*, *quo warranto*, *habeas corpus* and injunction which may be enforced in any part of their respective regions[.]

⁴⁶ An Act Expanding the Jurisdiction of the Court of Appeals, Amending for the Purpose Section Nine of Batas Pambansa Blg. 129, As Amended, Known as the Judiciary Reorganization Act of 1980.

⁴⁷ See *Agbayani, Jr. v. Director or Whoever is in Charge of the Manila City Jail*, G.R. No. 268876, August 7, 2024.

⁴⁸ See *Malingin v. Sandagan*, 887 Phil. 922, 929 (2020); *Gios-Samar, Inc. v. Department of Transportation and Communications*, 849 Phil. 120, 167 (2019); *Heirs of Bertuldo Hinog v. Melicor*, 495 Phil. 422, 433 (2005).

⁴⁹ *Rollo*, pp. 7–8.

⁵⁰ *Ilusorio v. Ilusorio-Yap*, 600 Phil. 688, 693 (2009).

established the existence of any of the well-recognized exceptions⁵¹ to the doctrine of hierarchy of courts, which she failed to do.

II. Mayor Dolor's detention is in accordance with legal processes

Even granting that the Court may relax the foregoing procedural rule in view of the fact that the assailed governmental action was committed by the House, a constitutional organ, the Petition must still be dismissed for lack of merit.

Pursuant to Rule 102, Section 1⁵² of the Rules of Court, a writ of *habeas corpus* may issue only if the respondent's confinement of and custody over the detained person is illegal or unlawful.⁵³ Hence, if the confinement of or custody over the detainee is in accordance with *legal* processes, a petition for *habeas corpus* that seeks the release of such detainee must be dismissed for lack of merit.⁵⁴

In this regard, the inherent power of the Congress to cite a person in contempt during inquiries in aid of legislation is well established and need not be belabored.⁵⁵ The power is not without limitations, as Article

⁵¹ *Colmenares v. Energy Regulatory Commission*, G.R. No. 246422, October 8, 2024, enumerates the exceptions to the doctrine of hierarchy of courts as follows:

- (1) when genuine issues of constitutionality are raised that must be addressed immediately;
- (2) when the case involves transcendental importance;
- (3) when the case is novel;
- (4) when the constitutional issues raised are better decided by this Court;
- (5) when time is of the essence;
- (6) when the subject of review involves acts of a constitutional organ;
- (7) when there is no other plain, speedy, adequate remedy in the ordinary course of law;
- (8) when the petition includes questions that may affect public welfare, public policy, or demanded by the broader interest of justice;
- (9) when the order complained of was a patent nullity; and
- (10) when the appeal was considered as an inappropriate remedy.

See also *Aala v. Uy*, 803 Phil. 36, 57 (2017), citing *The Diocese of Bacolod v. COMELEC*, 751 Phil. 301, 331–335 (2015).

⁵² SECTION 1. *To what habeas corpus extends.* – Except as otherwise expressly provided by law, the writ of *habeas corpus* shall extend to all cases of *illegal confinement or detention* by which any person is deprived of his liberty, or by which the rightful custody of any person is withheld from the person entitled thereto. (Emphasis supplied)

⁵³ *Atup v. People*, 914 Phil. 129, 146 (2021); *So v. Hon. Tacla, Jr.*, 648 Phil. 149, 160 (2010).

⁵⁴ *Atup v. People*, *id.*

⁵⁵ *Ong v. Senate of the Philippines*, *supra* note 60, at 861; *Balag v. Senate of the Philippines*, 835 Phil. 451 (2018).

VI, Section 21⁵⁶ of the 1987 Constitution particularly requires that the inquiry be in aid of legislation and must be conducted in accordance with the House's duly published rules of procedure. Further, the rights of the persons who appear in or are affected by the inquiry shall be respected.⁵⁷

In the case at bench, the grounds for the House Committee to cite a person in contempt are set forth in Section 11 of the House Rules for Legislative Inquiries, which was published on June 2, 2023, to wit:

SECTION 11. *Contempt.* – The committee may punish any person for contempt, by a vote of two-thirds (2/3) of the Members present, there being a quorum. The following shall be grounds for citing any person in contempt:

- a. refusal without legal excuse to obey summons;
- b. refusal to be sworn or placed under affirmation;
- c. refusal to answer any relevant inquiry;
- d. refusal to produce any books, papers, documents or records that are relevant to the inquiry and are in the possession of the concerned person;
- e. acting in a disrespectful manner towards any Member of the committee or any misbehavior in the presence of the committee; or
- f. undue interference in the conduct of proceedings.

Contempt of the committee shall be deemed contempt of the House. The person cited in this section may, upon order of the committee, be detained in such place as the Chairperson or acting Chairperson may designate.

Mayor Dolor was cited in contempt and ordered detained by the House Committee under Section 11(a) of the House Rules for Legislative Inquiries due to his failure to attend the Committee hearing held on March 17, 2025, despite notice thereof. Importantly, petitioner does not contest the fact that Mayor Dolor was notified of the hearing yet failed to appear thereat.

In the absence of a legal excuse, it cannot be denied that Mayor Dolor's non-appearance during the committee hearing despite due notice constitutes contumacious conduct under Section 11(a) of the House Rules

⁵⁶ SECTION 21. The Senate or the House of Representatives or any of its respective committees may conduct inquiries in aid of legislation in accordance with its duly published rules of procedure. The rights of persons appearing in or affected by such inquiries shall be respected.

⁵⁷ See *Ong v. Senate of the Philippines*, *supra* note 41, at 949.



for Legislative Inquiries, i.e., refusal without legal excuse to obey summons. This violation authorizes the House Committee to cite Mayor Dolor in contempt and order his detention during the legislative inquiry.

*1. The House Committee inquiry
is in aid of legislation*

Petitioner argues that Mayor Dolor's detention is illegal because the inquiry being conducted by the House Committee is *not* in aid of legislation but, rather, a political machination.

The argument lacks merit.

The aim of inquiries in aid of legislation is to "assist and recommend to the legislature a possible action that the body may take with regard to a particular issue, specifically as to whether or not to enact a new law or amend an existing one."⁵⁸ The power of the Congress to conduct inquiries in aid of legislation is necessarily *broad* because it "cannot legislate wisely or effectively in the absence of information respecting the conditions which the legislation is intended to affect or change."⁵⁹

"To be within the jurisdiction of the legislative body making it, the inquiry must be material or necessary to the exercise of a *power vested in it* by the Constitution, such as to legislate or to expel a member."⁶⁰ The Court has thus ruled that an inquiry is *not* in aid of legislation if "it is not related to a purpose within the *jurisdiction* of Congress."⁶¹

Here, petitioner's averment is easily belied by House Resolution No. 2148,⁶² which clearly states that the inquiry of the House Committee aims to "[i]dentify *legislative gaps* in existing laws governing procurement, privatization, and local government operations" and to "[p]ropose *legislative measures* to strengthen transparency, accountability, and oversight mechanisms in local government transactions and to safeguard public resources."⁶³ The House Resolution further states that the inquiry was necessary for the House Committee to come up with

⁵⁸ *Manotok Realty, Inc. v. CLT Realty Development Corp.*, 512 Phil. 679, 710 (2005).

⁵⁹ *Senate of the Philippines v. Executive Secretary Medialdea*, 924 Phil. 814, 829 (2022).

⁶⁰ *Id.* at 830, citing *Bengzon Jr. v. Senate Blue Ribbon Committee*, 280 Phil. 829, 841-842 (1991).

⁶¹ *Bengzon Jr. v. Senate Blue Ribbon Committee*, *id.* at 847.

⁶² *Rollo*, pp. 99-101.

⁶³ *Id.* at 100-101.

“*legislative measures* to prevent the recurrence” of irregularities that are similar to those that allegedly occurred in relation to the privatization of BWS and the construction of the Bauan Plaza Hotel.⁶⁴

Evidently, in conducting the inquiry, the House Committee was tasked to identify gaps in the applicable statutes and to propose legislative measures to the House. These matters undeniably fall within the *exclusive* jurisdiction of the Congress to enact laws. Hence, the House Committee inquiry is in aid of legislation.

Admittedly, House Resolution No. 2148 includes purposes which are not *strictly* within the exclusive jurisdiction of Congress, i.e., the investigation of crimes related to the privatization of BWS and the construction of Bauan Plaza Hotel, the determination of the accountability of Mayor Dolor and the other individuals involved, and the institution of appropriate legal remedies and sanctions about the matter. The investigation and prosecution of crimes are within the realm of the Executive Department, which is the branch of government in charge of the faithful execution of the laws.⁶⁵ Meanwhile, the ascertainment of a person’s culpability and guilt for a crime is within the province of the Judiciary.

Certainly, the Congress cannot, in the guise of inquiries in aid of legislation, effectively usurp or undermine the constitutional prerogatives of the other branches of government.⁶⁶ However, the power of the Legislature to conduct inquiries in aid of legislation cannot be so easily set aside by the Court based only on an assertion of improper or unworthy motives or purposes behind the inquiry.

As held by the United States Supreme Court in *Tenney v. Brandhove*,⁶⁷ which has persuasive value in this case,⁶⁸ the Court must confine itself to ascertaining whether the legislative inquiry may *fairly* be deemed within the province of the Legislature. To conclude that the House or Senate investigation has exceeded the bounds of its legislative power, it must be *obvious* that there was a usurpation of functions exclusively

⁶⁴ *Id.* at 100.

⁶⁵ *Gonzalez v. Hongkong & Shanghai Banking Corp.*, 562 Phil. 841, 855 (2007).

⁶⁶ *In re Representatives*, 702 S.W.3d 330, 347 (Tex. 2024); *See also Bengzon Jr. v. Senate Blue Ribbon Committee*, *supra* note 6, at 861.

⁶⁷ 341 U.S. 367 (1951).

⁶⁸ The Congress’ inherent power of contempt has origins in American jurisprudence, which is thus persuasive. *See Arnault v. Nazareno*, 87 Phil. 29 (1950).

vested in the Judiciary or the Executive:

We come then to the question whether from the pleadings it appears that the defendants were acting in the sphere of legitimate legislative activity. Legislatures may not of course acquire power by an unwarranted extension of privilege[.]

The claim of an unworthy purpose does not destroy the privilege. Legislators are immune from deterrents to the uninhibited discharge of their legislative duty, not for their private indulgence but for the public good. One must not expect uncommon courage even in legislators. *The privilege would be of little value if they could be subjected to the cost and inconvenience and distractions of a trial upon a conclusion of the pleader, or to the hazard of a judgment against them based upon a jury's speculation as to motives.* The holding of this Court in *Fletcher v. Peck*, 6 Cranch 87, 130, that it was not consonant with our scheme of government for a court to inquire into the motives of legislators, has remained unquestioned. See cases cited in *Arizona v. California*, 283 U.S. 423, 455.

Investigations, whether by standing or special committees, are an established part of representative government. Legislative committees have been charged with losing sight of their duty of disinterestedness. In times of political passion, dishonest or vindictive motives are readily attributed to legislative conduct and as readily believed. Courts are not the place for such controversies. Self-discipline and the voters must be the ultimate reliance for discouraging or correcting such abuses. *The courts should not go beyond the narrow confines of determining that a committee's inquiry may fairly be deemed within its province. To find that a committee's investigation has exceeded the bounds of legislative power it must be obvious that there was a usurpation of functions exclusively vested in the Judiciary or the Executive.* The present case does not present such a situation. Brandhove indicated that evidence previously given by him to the committee was false, and he raised serious charges concerning the work of a committee investigating a problem within legislative concern. The Committee was entitled to assert a right to call the plaintiff before it and examine him.⁶⁹ (Emphasis supplied)

To determine whether an inquiry is for a valid legislative purpose, the Court must consider the House resolution referring the matter to its committee for investigation as a *whole*. If in the entirety, the inquiry looks to possible legislation and the House or Senate's investigation refers to matters that are within its legislative authority, then the inquiry should be upheld as a valid exercise of legislative powers. Further, if the resolution is susceptible of two constructions, one of which will sustain the validity

⁶⁹ *Tenney v. Brandhove*, *supra* note 67, 376-378.

of the inquiry and the other defeat it, the Court must adopt the former. This was the tenor of the ruling in *Du Bois v. Gibbons*,⁷⁰ to wit:

[T]here is nothing in the ordinance which indicates an intention to usurp judicial functions. The provision that the committee shall recommend such improvements that it deems necessary to restore the confidence of the people in the police department and in the administration of justice does not mean that it is contemplated that the council will seek to pass legislation regulating the courts or that it will investigate the courts themselves. *A consideration of the ordinance as a whole, including its preamble, indicates that the council intended an investigation only of those officers and employees of the city with respect to whom it had some legislative responsibility, particularly the members of the police force, who are part of the legal machinery for the administration of justice. If an ordinance is susceptible of two constructions, one of which will sustain the ordinance and the other defeat it, the courts will adopt the construction sustaining the ordinance. . . .* Since a sensible and reasonable construction of the ordinance in question avoiding a conclusion of usurpation of judicial functions is possible, that construction will be adopted. *There is nothing in the pleadings in this case showing any effort to interfere with or usurp the powers of the judiciary.* Nor is there any merit in the contention that the ordinance purports to delegate to the emergency committee on crime the functions of the grand jury, prosecutor and jury. The committee can neither indict, try, acquit, nor convict. It has no power to impose any penalty. *The committee has the sole power and function of recommending municipal legislation as the result of its investigation. The fact that information secured by the committee might also be of interest and use to a prosecutor or grand jury is no argument against the validity of the ordinance.* We cannot arbitrarily read into this ordinance provisions relating to returning indictments, prosecuting criminals or trying them for crimes. Such provisions are not even suggested by any fair or reasonable interpretation of its provisions.

....

A consideration of all the provisions of the ordinance of February 14, 1952, indicates a valid legislative purpose. By the express provisions of the ordinance the committee is to recommend improvements. It fairly appears from the ordinance and its preamble considered as a whole that the city council was concerned about the general inadequacy of law enforcement; that it wanted an investigation made of the situation to determine to what extent it had been affected by council action or inaction and that it wanted recommendations from the committee as to what steps, if any, could be taken by the council to improve the situation. At least so far as the

⁷⁰ 2 Ill. 2d 392, 394, 118 N.E.2d 295, 298 (1954).



*ordinance itself is concerned it looks to possible legislative action and has a proper legislative purpose[.]*⁷¹ (Emphasis supplied; citations omitted)

Here, a reading of House Resolution No. 2148 easily discloses that the purpose of the inquiry is to look for possible legislation in relation to government procurement, privatization, and local government operations. Although the Resolution includes purposes related to the investigation and the prosecution of crimes, the matters and persons to be investigated all fall within the legislative authority of the Congress. It is also evident from the House Resolution that the investigation is ultimately aimed at identifying gaps in the applicable statutes.

Further, there is nothing in the records before the Court that would warrant the conclusion that the House Committee conducted the inquiry to usurp Executive and Judicial functions. Like *Du Bois*, the House Committee's function is recommendatory at most. In fact, even in House Resolution No. 2148, it could only "institute" or set in motion the appropriate legal remedies against the persons investigated, which confirms the recommendatory nature of the Committee's conclusions and findings. This is further confirmed by Section 16 of the House Rules for Legislative Inquiries, to wit:

SECTION 16. *Report of Committee.* – The report shall contain the findings of the committee on the subject matter of the inquiry, the grounds on which its findings are based and its *recommendations*, if any.

The report shall be approved by a majority vote of the Members present, there being a quorum. Members who vote against the approval of the report and who do not sign the majority report may make concurring or dissenting opinions. The report, together with any concurring and dissenting opinion, shall be filed with the Secretary General who shall include the same in the Order of Business within three (3) days from receipt thereof.

In case of joint inquiry, the committees concerned shall be jointly responsible for submitting the report to the House on the measure referred to them for consideration. The first committee mentioned in the joint referral shall be the lead committee and shall be principally responsible for preparing the report to the House: Provided, That the committees may decide to designate which committee among them shall prepare the report. (Emphasis supplied)

⁷¹ *Id.* at 411-413, 305-307.

The present case should be distinguished from *Bengzon Jr.*,⁷² where the Court found that the Senate inquiry was not in aid of legislation because its aim was "to find out whether or not the relatives of the President or Mr. Ricardo Lopa had violated Section 5 of [Republic Act] No. 3019, the 'Anti-Graft and Corrupt Practices Act,' a matter that appears more within the province of the courts rather than of the legislature." In that case, the privilege speech of the senator who referred the matter to the Senate committee specifically mentioned that it must "look into the possible violation" of Republic Act No. 3019, without mentioning any legislative purpose:

Senator Enrile concluded his privilege speech in the following tenor:

"Mr. President, it may be worthwhile for the Senate to look into the possible violation of the law in the case particularly with regard to Republic Act No. 3019, the Anti-Graft and Corrupt Practices Act, Section 5 of which reads as follows and I quote:

....

It appears, therefore, that the contemplated inquiry by respondent Committee is not really "in aid of legislation" because it is not related to a purpose within the jurisdiction of Congress, since the aim of the investigation is to find out whether or not the relatives of the President or Mr. Ricardo Lopa had violated Section 5 of [Republic Act] No. 3019, the "Anti-Graft and Corrupt Practices Act", a matter that appears more within the province of the courts rather than of the legislature.⁷³

The Court further emphasized in *Bengzon, Jr.* that the allegations against the Lopa group were already the subject of a civil case before the Sandiganbayan, thus warranting the conclusion that the inquiry was an encroachment into the exclusive domain of the Judiciary. Evidently, in *Bengzon, Jr.*, the legislative inquiry cannot be fairly regarded as being in aid of legislation because it was obviously conducted for a purpose that is outside the jurisdiction of the Congress, which meets the standards set forth in *Tenney*.

In contrast to *Bengzon, Jr.*, the records in this case do not disclose any obvious attempt on the part of the House Committee to usurp the

⁷² *Supra* note 55, at 847.

⁷³ *Id.* at 844-847.



functions of the other branches of government. As previously discussed, House Resolution No. 2148 provides for a legislative purpose for the inquiry. There is also nothing in the pleadings that would show that the subject matter of the inquiry is already pending before any court or Executive office in any proceeding. Applying the *Tenney* and *Du Bois* standards, the Court must uphold the House Committee inquiry subject of the present case as a valid exercise of legislative powers, as it may be fairly interpreted and regarded as being in aid of legislation.

2. *It is not necessary for the Speaker of the House to sign a contempt order by a House committee*

Petitioner further submits that the Contempt and Detention Order is void because it was not signed by the Speaker of the House, which is allegedly violative of Rule IV, Section 15(j) of the Rules of the House of the 19th Congress.

The Court does not agree.

Rule IV, Section 15(j) states that the Speaker of the House shall "sign all acts, resolutions, memorials, writs, warrants and *subpoenae* that may be issued by or upon order of *the House*." The "House" under Rule II, Section 4⁷⁴ of the Rules of the House of the 19th Congress is composed of the elected representatives of legislative districts and those elected through the party-list system. Obviously, Rule IV, Section 15(j) relates to the business of the House as a *collective* body and does not necessarily pertain to the processes of its committees.

It should be stressed that Section 1 of the House Rules for Legislative Inquiries expressly states that House committees may conduct inquiries in aid of legislation in accordance with the said rules:

⁷⁴ SECTION 4. *Composition*. — The membership of the House shall be composed of elected representatives of legislative districts and those elected through the party-list system. Membership as Representative of a legislative district commences upon proclamation as a winning candidate, the administration of an oath for the office by a duly authorized public officer and assumption of office on June 30 following the election. In cases where a candidate has been proclaimed winner by the Commission on Elections, and the validity of the proclamation is put in question in any judicial or administrative body, such candidate who has been proclaimed winner and assumed office on June 30 following the election shall remain a Member of the House absent final and executory judgement on or resolution of the question over the proclamation of the Member by the appropriate judicial or administrative bodies.



SECTION 1. *Power to Conduct Inquiries.* – Pursuant to Section 21, Article VI of the Constitution, the House of Representatives or any of its committees, may conduct inquiries in aid of legislation *in accordance with these rules.* (Emphasis supplied)

Thus, the Court cannot subscribe to petitioner's assertion on the applicability of Rule IV, Section 15(j) of the Rules of the House of the 19th Congress to a contempt order that was issued by a House committee during an inquiry in aid of legislation. Instead, the Court must apply the pertinent provisions of the House Rules for Legislative Inquiries in ascertaining whether the House Committee, while conducting an inquiry in aid of legislation, validly cited Mayor Dolor in contempt.

In this regard, there is nothing in Section 11 of the House Rules for Legislative Inquiries or other provisions thereof that require the Speaker to sign a contempt order issued by a House committee. Section 11 merely states that the "committee may punish any person for contempt, by a vote of two-thirds (2/3) of the Members present, there being a quorum," and that the person cited in contempt "may, upon order of the committee, be detained in such place as the Chairperson or acting Chairperson may designate."

Notably, in contrast to Section 11, Section 8⁷⁵ of the House Rules for Legislative Inquiries expressly requires the signature of the Speaker or Acting Speaker in a subpoena *ad testificandum* and *duces tecum*. This goes to show that unlike a subpoena, the signature of the Speaker is *not* indispensable in a contempt order issued by a House committee. Certainly, if the signature of the Speaker was necessary in a contempt order of a House committee, then the House Rules for Legislative Inquiries would have included it in Section 11, yet it does not.

Rule IV, Section 15(j) should also be read together with Rule IV, Section 15(c)⁷⁶ of the Rules of the House of the 19th Congress, which

⁷⁵ SECTION 8. *Attendance of Witnesses.* – The committee shall have the power to issue subpoena ad testificandum and subpoena duces tecum to witnesses in any part of the country, signed by the Chairperson or acting Chairperson and the Speaker or acting Speaker. However, if the committee is unable to secure the signature of the Speaker or acting Speaker on a subpoena ad testificandum and/or subpoena duces tecum, it may request the Committee on Rules to act on the matter. Upon the recommendation of the Committee on Rules through a majority vote of all its Members after determining that the attendance of a witness is indispensable to the effective conduct of the inquiry, the Speaker shall issue a subpoena ad testificandum and/ or a subpoena duces tecum to compel the attendance of a witness[.]

⁷⁶ SECTION 15. *Duties and Powers.* – The Speaker, as the political and administrative head of the

provides that the Speaker of the House exercises *general supervision* over all committees. "Supervisory power, when contrasted with control, is the power of mere *oversight* over an inferior body; it does not include any *restraining* authority over such body."⁷⁷ Supervision translates to "overseeing or the power or authority of an officer to see that subordinate officers perform their duties."⁷⁸

If petitioner's argument is to be given merit, the Speaker would essentially be granted veto powers over a House committee's exercise of its power of contempt under Section 11 of the House Rules for Legislative Inquiries. To illustrate, despite a determination by a House committee that a person committed contumacious acts during a legislative inquiry, the Speaker could effectively *restrain* the committee's exercise of its contempt powers by simply refusing to sign the contempt order. Such a situation is beyond the general supervisory power of the Speaker over the committees of the House.

Accordingly, the House Committee may validly issue the Contempt and Detention Order, provided that the requisite quorum and votes under Section 11 of the House Rules for Legislative Inquiries were met. The Speaker of the House need not sign the Contempt and Detention Order because it is not required by Section 11.

Relevantly, the Contempt and Detention Order expressly states that "upon unanimous vote of the Members of the Committee present, there being a quorum, [Mayor Dolor] [has] been cited for CONTEMPT and ordered DETAINED at the House of Representatives until the termination of the inquiry."⁷⁹ It thus appears that the requisite quorum and votes under Section 11 were complied with when the House Committee issued the Contempt and Detention Order. There is therefore no reason for the Court to declare the Contempt and Detention Order null and void for failure to

House, is responsible for the overall management of the proceedings, activities, resources, facilities and employees of the House.

The Speaker shall:

....
c. exercise general supervision over all committees and, in furtherance thereof, conduct regular monthly meetings with the chairpersons and vice-chairpersons of all standing and special committees to set legislative targets, review performance in the attainment of targets, ensure that the priority legislative measures of committees are attuned to the legislative agenda of the House, and resolve such other issues and concerns that affect the operations and performance of the committees;

⁷⁷ *Pimentel, Jr. v. Aguirre*, 391 Phil. 84, 99 (2000).

⁷⁸ *Id.*

⁷⁹ *Rollo*, p. 26.

comply with the House Rules for Legislative Inquiries.

*3. The House Committee may
validly conduct hearings while
the House is in adjournment*

Next, petitioner avers that the Contempt and Detention Order is void because the House had already adjourned its Third Regular Session on February 5, 2025, which resumed only on June 2, 2025. She implies that the House Committee cannot validly hold a hearing on March 17, 2025, and cause the arrest of Mayor Dolor on March 27, 2025, while the House was in adjournment. Supposedly, with such adjournment, the citation of Mayor Dolor for contempt and his detention cannot be in aid of legislation.

Petitioner's arguments are contrary to the relevant rules and jurisprudence.

The Court has long recognized that legislative functions may be and in practice are performed by the duly constituted committees of the House or the Senate that are charged with the duty of performing investigations, hearings, or inquiries relative to any proposed legislation.⁸⁰ In fact, Article VI, Section 21⁸¹ of the 1987 Constitution expressly states that legislative inquiries may be conducted by the *committees* of the Senate or the House. Likewise, Rule IX, Section 26⁸² of the Rules of the House of the 19th Congress directs the House to organize committees that shall act upon matters that were referred to them by the House, including the conduct of inquiries in aid of legislation.⁸³

⁸⁰ *Arnault v. Nazareno*, *supra* note 68, at 62.

⁸¹ SECTION 21. The Senate or the House of Representatives or any of its respective committees may conduct inquiries in aid of legislation in accordance with its duly published rules of procedure. The rights of persons appearing in or affected by such inquiries shall be respected.

⁸² SECTION 26. *Duties and Functions.* – Committees shall study, deliberate on and act upon all measures referred to them inclusive of bills, resolutions and petitions, and shall recommend for approval or adoption by the House those that, in their judgment, advance the interests and promote the welfare of the people.

⁸³ HOUSE RULES FOR LEGISLATIVE INQUIRIES, sec. 1 states:
SECTION 1. *Power to Conduct Inquiries.* – Pursuant to Section 21, Article VI of the Constitution, the House of Representatives or any of its committees, may conduct inquiries in aid of legislation in accordance with these rules.

Relatedly, the Court held in *Arnault v. Nazareno*⁸⁴ that the Senate and the House may *authorize* their duly constituted committees to conduct legislative inquiries and investigations even during congressional *recess*. *Balag v. Senate of the Philippines*⁸⁵ similarly instructs that the Senate, *while on recess*, may exercise its power of contempt during legislative hearings.

In this regard, Rule IX, Section 35 of the Rules of the House of the 19th Congress provides that a House committee may conduct meetings, conferences, or hearings at such time that it may determine. When the House has *adjourned* or is in recess, the House Committee on Rules and such committees to which it has granted *permission* may hold meetings:

SECTION 35. *Place, Time and Notice of Meetings.* – All committees and sub-committees shall conduct their meetings, conferences or hearings at such time they may determine in any of the conference rooms within the House premises or, whenever necessary, in any other place when so authorized by the Speaker. The Speaker, in consultation with the Majority Leader and subject to the internal rules that shall be adopted by each committee pursuant to Section 34 hereof, may authorize committees to conduct meetings, conferences, or hearings through electronic platforms like video conference, telecommunications and other computer online technologies. *Only the Committee on Rules and such committees to which it has granted permission, may meet while the House is in plenary session, has adjourned, or is in recess.* (Emphasis supplied)

Thus, a number of meetings and hearings of House committees were included in the calendar⁸⁶ of the House even after it adjourned its Third Regular Session on February 5, 2025, to wit:

- (1) the hearings held by the House Committee on Public Accounts for the subject matter of the present case on February 26, 2025 and March 17, 2025, as well as the meetings that it held on both dates, concerning the alleged misuse of public funds from the Office of the Chief Minister of the Bangsamoro Autonomous Region in Muslim Mindanao;

⁸⁴ *Arnault v. Nazareno*, *supra* note 68.

⁸⁵ *Supra* note 55, at 471.

⁸⁶ House of the 19th Congress Website. Committee Meetings-Weekly Schedule. Available at <https://www.congress.gov.ph/committees/committee-meetings/> [Last accessed on June 12, 2025.]

- (2) the joint meetings of the House Committees on Public Order and Safety, Information and Communications Technology, and Public Information on February 18, 2025 and March 21, 2025, concerning online attacks and harassment from trolls and malicious bloggers despite the passage of Republic Act No. 10175 or the Cybercrime Prevention Act of 2012;
- (3) the meeting of the House Committee on Government Reorganization on February 18, 2025, concerning House Bill No. 9068 in relation to ancestral lands and Republic Act No. 8371 or the Indigenous People's Rights Act of 1997;
- (4) the meeting of the House Committee on Visayas Development on February 24, 2025, concerning the establishment of the Negros Island Region pursuant to Republic Act No. 12000;
- (5) the meeting of the House Committee on Banks and Financial Intermediaries on March 5, 2025, concerning several house bills related to government banks and their loan and credit facilities;
- (6) the meetings of the House Committee on Basic Education and Culture on March 6 and 19, 2025, concerning the alleged "ghost beneficiaries" of the Senior High School Voucher Program; and
- (7) the meeting of the House Committee on Transportation on March 19, 2025, concerning House Bill No. 11433, which relates to the policy and organizational reforms in the Philippine Coast Guard.

Evidently, various committees of the House, including the Committee on Public Accounts, were allowed to conduct hearings and meetings in connection with their functions even during the period of adjournment of the House from February 5, 2025, to June 1, 2025.⁸⁷ The House Committee was therefore validly conducting an inquiry in aid of legislation on March 17, 2025. Hence, on said date, it could properly cite Mayor Dolor in contempt and also cause his arrest on March 27, 2025.

⁸⁷ After February 5, 2025, the next Order of Business uploaded in the website of the House of Representatives of the 19th Congress is dated June 2, 2025. Available at <https://www.congress.gov.ph/legislative-documents/order-of-business/> [Last accessed on June 11, 2025.]



Besides, the adjournment of the House on February 5, 2025 does not necessarily terminate its legislative authority over unfinished business. Verily, Rule XI, Section 80 of the Rules of the House of the 19th Congress distinguishes between the effect of an interim adjournment and the end of the term of a Congress on unfinished business. In the former, the consideration of unfinished business shall be *resumed* until it is disposed of, while in the latter, all unfinished businesses are *deemed terminated*:

SECTION 80. *Calendar of Business.* – The Calendar of Business shall consist of the following:

a. Unfinished Business. – This is business being considered by the House at the time of its last adjournment. Its consideration shall be resumed until it is disposed of.

The Unfinished Business at the end of a session shall be resumed at the commencement of the next session as if no adjournment has taken place. *At the end of the term of a Congress*, all unfinished business are deemed *terminated*. (Emphasis supplied)

In accordance with the foregoing, the Court in *Balag*⁸⁸ acknowledged that a legislative inquiry, as well as a contempt order issued in connection therewith, may continue until the expiration of one Congress. Likewise, in *Arnault*⁸⁹ the Court ruled that as long as the members of the legislative body against which the contempt was committed have not yet completed their three-year *term*, the House may take action against the contemner.

For the 19th Congress, the term of office of the House members is for a period of three years⁹⁰ from June 30, 2022, or until June 30, 2025. Obviously, the term of the members of the House of the 19th Congress has not yet ended when Mayor Dolor was cited in contempt on March 17, 2025, and thereafter arrested on March 27, 2025. The House Committee could therefore validly cite Mayor Dolor in contempt and order his arrest on those dates.

⁸⁸ *Supra* note 55, at 475.

⁸⁹ *Supra* note 68, at 58.

⁹⁰ Under Book I, Chapter 8, Section 31 of Executive Order No. 292, Series of 1987 or the 1987 Administrative Code, a year shall be understood as 12 calendar months:

Section 31. *Legal Periods.* – “Year” shall be understood to be twelve calendar months; “month” of thirty days, unless it refers to a specific calendar month in which case it shall be computed according to the number of days the specific month contains; “day,” to a day of twenty-four hours; and “night,” from sunset to sunrise.

Moreover, under the Legislative Calendar⁹¹ of the Third Regular Session of the Congress, the session adjournment of the House is only from February 5, 2025 until June 1, 2025. The Session shall *resume* on June 2, 2025:

CALENDAR OF SESSION

THIRD REGULAR SESSION

....

6. Adjournment of Session – February 8, 2025 to June 1, 2025

7. Resumption of Session – June 2, 2025 to June 13, 2025

(Sine Die Adjournment)

8. Adjournment of Session – June 14, 2025 to July 27, 2025

Evidently, the adjournment on February 5, 2025, which is *before* the expiration of the 19th Congress, did *not* result in the termination of the legislative inquiry by the House Committee. Rather, under the pertinent rules, the inquiry could be continued by the House Committee even during such adjournment.

In fine, on March 17, 2025 and March 27, 2025, while the House was in adjournment, the House Committee possessed the legislative authority to conduct inquiries in aid of legislation and could therefore cite Mayor Dolor in contempt and order his arrest.

*4. Mayor Dolor was validly
arrested in accordance with the
contempt powers of the House
Committee*

Petitioner then questions the arrest of Mayor Dolor on March 27, 2025 without a judicial warrant. Allegedly, pursuant to Article III, Section 2⁹² of the 1987 Constitution, Mayor Dolor may be validly arrested only

⁹¹ *Rollo*, p. 215.

⁹² SECTION 2. The right of the people to be secure in their persons, houses, papers, and effects against unreasonable searches and seizures of whatever nature and for any purpose shall be inviolable, and no search warrant or warrant of arrest shall issue except upon probable cause to be

upon a finding of probable cause by a competent judge and only on the strength of a judicial warrant.

Petitioner's argument is contrary to jurisprudence.

The Court has already pronounced in *Ong v. Senate of the Philippines*⁹³ that the constitutional power of the Senate to conduct inquiries in aid of legislation necessarily carries with it the power to issue processes for its enforcement. This includes the inherent power of the Senate during inquiries in aid of legislation to cite a person in contempt and the concomitant power to order the arrest of such contemner.

Indeed, as early as 1950, the Court in *Arnault v. Nazareno*,⁹⁴ citing *Anderson v. Dunn*,⁹⁵ discussed the inherent power of the House to cite a person in contempt for disrupting its proceedings and in connection therewith, to issue an order directing its Sergeant-at-Arms to *arrest* the contemner and to take them into custody, wherever they may be found, so that they may be brought before the House for the latter to hear their defenses and if found unmeritorious, to order their detention.

Pertinently, the lack of a judicial arrest warrant was precisely raised as an issue in *Anderson v. Dunn*,⁹⁶ a case decided by the US Supreme Court. In the case, the US Supreme Court did not find merit in the argument that the arrest of the contemner was invalid in the absence of a judicial warrant. It ruled that the principle of *self-preservation* serves as basis for the power of the House to cite a person in contempt and to order their arrest as an incident thereof. It applied by analogy the contempt power of the courts, which are universally acknowledged to be inherently vested in the courts by their very creation so that they may preserve and exercise their judicial functions.⁹⁷

determined personally by the judge after examination under oath or affirmation of the complainant and the witnesses he may produce, and particularly describing the place to be searched and the persons or things to be seized.

⁹³ *Supra* note 41, at 948-949.

⁹⁴ *Supra* note 68, at 43.

⁹⁵ 19 U.S. (6 Wheat.) 204 (1821).

⁹⁶ In *Balag v. Senate of the Philippines*, *supra* note 55, at 464, the Court explained that "[t]he contempt power of the legislature under our Constitution is sourced from the American system." As such, American jurisprudence has persuasive effect in controversies involving the contempt powers of the Congress.

⁹⁷ *Anderson v. Dunn*, *supra*, at 207, 230.

Besides, the Constitution does *not* absolutely prohibit the arrest of a person without a judicial warrant. What the constitution abhors is “*unreasonable* searches and seizures.” Thus, there are *valid warrantless arrests* that are recognized in our jurisdiction because in those instances, the arrest without a judicial warrant is deemed not unreasonable.⁹⁸

The rationale in favor of valid warrantless arrests applies to the present case. Despite the absence of a judicial warrant, the arrest of a person who has been cited in contempt by the Congress is *not unreasonable* under Article III, Section 2 of the 1987 Constitution. This is because the arrest is made only as an incident of the Legislature’s authority to cite a person in contempt, a power that is inherent in the Congress and which it must necessarily possess for it to effectively perform its legislative functions. Also, the unreasonableness of the arrest is abated because the contempt and detention orders are issued by the lawmakers, who are acting under their *oath* of office, in connection with the incidents of their own proceedings that are undoubtedly within their knowledge.⁹⁹

It would be absurd to deny the House or its committees the power to order the arrest of a person who has been cited in contempt during legislative inquiries. Absent such authority, any person could effectively prevent the House or any of its committees from performing their essential legislative functions by committing contumacious conduct yet staying outside the physical premises of the House. Any contempt order issued against such a person would be useless, which would defeat the very purpose of a contempt order—for the House to preserve and exercise the legislative authority that was granted to it by the Constitution.

Petitioner’s argument is also anathema to the principle of separation of powers, which accords *co-equal* status to the three branches of government.¹⁰⁰ If all courts possess the inherent power of contempt and to order the arrest of such contemner, it follows that the Congress, as a co-equal branch of government, must possess the same power of self-preservation as the Judiciary. Otherwise, the Legislature will be relegated to a body that is subordinate to and at the mercy of the Judiciary if a person, despite contempt of legislative proceedings, cannot be arrested absent a judicial warrant.

⁹⁸ Rule 113, Section 5 of the Revised Rules of Criminal Procedure recognizes permissible warrantless arrest, to wit: (1) arrest *flagrante delicto*; (2) arrest effected in hot pursuit; and (3) arrest of escaped prisoners. *People v. Figueroa*, 390 Phil. 561, 577 (2000).

⁹⁹ *McGrain v. Daugherty*, 273 U.S. 135, 156–157, 47 S. Ct. 319, 322–323 (1927).

¹⁰⁰ *Malayan Integrated Industries, Corp. v. Court of Appeals*, 288 Phil. 534, 545 (1992).

Accordingly, the Court holds that Mayor Dolor may be arrested by the House's Sergeant-at-Arms pursuant to the Contempt and Detention Order and even in the absence of a judicial warrant. The arrest, being merely incidental to the inherent contempt powers of the House, is not an unreasonable arrest or seizure in the context of Article III, Section 2 of the 1987 Constitution.

5. *The contempt order was not issued in violation of Mayor Dolor's rights*

In the conduct of inquiries in aid of legislation, the Senate, the House, or any of their respective committees possess the power to decide what constitutes contempt under the pertinent rules and to punish it at their discretion,¹⁰¹ subject to the limits imposed by the 1987 Constitution.¹⁰² In this regard, Section 11(a) of the House Rules for Legislative Inquiries provides that a person who refuses *without legal excuse* to obey summons may be cited in contempt.

Undoubtedly, the failure of a person, despite notice and without a valid excuse, to appear before the House or any of its committees during an inquiry in aid of legislation constitutes contempt of the House.¹⁰³ What may be considered as a valid ground to excuse a person's non-appearance during a legislative inquiry despite summons is subject to the discretion of the House or its committees.¹⁰⁴

It must be stressed that the Legislature is a co-equal branch of government. Hence, the principle of separation of powers behooves the Court to interfere with inquiries in aid of legislation, as well as the Congress' exercise of its contempt powers in connection therewith, only when there has been *grave abuse of discretion*,¹⁰⁵ which has been defined as follows:

¹⁰¹ See *Coffin v. Coffin*, 4 Mass. 1, 23 (1808).

¹⁰² See 1987 CONSTITUTION, art. VI, sec. 21 which states:

SECTION 21. The Senate or the House of Representatives or any of its respective committees may conduct inquiries in aid of legislation in accordance with its duly published rules of procedure. The rights of persons appearing in, or affected by, such inquiries shall be respected.

¹⁰³ See *Sabio v. Gordon*, 535 Phil. 687, 718 (2006).

¹⁰⁴ See *Spouses Khonghun v. United Coconut Planters Bank*, 529 Phil. 311, 316 (2006); *Fountainhead International Philippines, Inc. v. Court of Appeals*, 271 Phil. 831 (1991).

¹⁰⁵ *Ong v. Senate of the Philippines*, *supra* note 41.

Grave abuse of discretion is a concept well defined by jurisprudence. It connotes a capricious and whimsical exercise of judgment which amounts to lack of jurisdiction. To warrant the nullification of the assailed issuance, the abuse of discretion must be grave as where the power is exercised in an arbitrary or despotic manner by reason of passion or personal hostility and must be so patent and gross as to amount to an evasion of positive duty or to a virtual refusal to perform the duty enjoined by or to act at all in contemplation of law. There is grave abuse of discretion in cases where there are palpable errors of jurisdiction; a violation of the Constitution, law, or jurisprudence; or when there has been a gross misapprehension of facts.¹⁰⁶

In other words, for the Court to nullify a contempt order of the House or its committees, the petitioner must establish that the order was issued in violation of the Constitution, the law, or jurisprudence, or is without any factual basis. Stated otherwise, the Court will *not* interfere with the House's determination on whether a party's absence during a legislative hearing despite due notice thereof is excusable or not, as long as its conclusions are supported by the relevant laws, rules, and evidence on record.¹⁰⁷

Here, there is no dispute that Mayor Dolor failed to attend the House Committee hearing held on March 17, 2025, despite notice thereof. To justify his absence, petitioner points to the letters that Mayor Dolor sent to the House Committee concerning his illness. She contends that the Committee violated the due process rights of Mayor Dolor because it arbitrarily disregarded his illness and refused to consider the same as a valid excuse for his non-appearance in the committee hearing.

The Court finds no merit in petitioner's argument. No grave abuse of discretion may be imputed to the House Committee when it cited Mayor Dolor in contempt and ordered his detention.

The essence of due process is a reasonable opportunity to be heard or to explain one's position and to submit evidence in support of their claims or defenses.¹⁰⁸ Due process contemplates freedom from arbitrariness and requires fairness or justice, the substance rather than the

¹⁰⁶ *Imperial v. People*, 906 Phil. 424, 431–432 (2021), *Pascual v. Burgos*, 776 Phil. 167, 190–191 (2016); *United Coconut Planters Bank v. Looyuko*, 560 Phil. 581, 591–592 (2007).

¹⁰⁷ *Natividad v. Marquez*, 38 Phil. 608, 611–612 (1918).

¹⁰⁸ *Power Homes Unlimited Corp. v. Securities and Exchange Commission*, 570 Phil. 161, 168 (2008); *Mutuc v. Court of Appeals*, 268 Phil. 37, 43 (1990).

form being paramount.¹⁰⁹ It behooves the concerned tribunal to consider the evidence presented by the party in resolving the case or controversy before it.¹¹⁰

Contrary to petitioner's assertion, the due process right of Mayor Dolor was not violated by the House Committee. The records show that before issuing the Contempt and Detention Order, the House Committee duly considered the excuses that Mayor Dolor proffered in his excuse letter and the attachments thereto. The Committee scrutinized these pieces of evidence but ultimately did not find merit in Mayor Dolor's position.

Particularly, the House Committee concluded that the excuses proffered by Mayor Dolor for his non-appearance were unsubstantiated by reliable medical records and were manifestly contrived. The committee members especially noted that Mayor Dolor was informed of the hearing as early as March 5, 2025, yet he suspiciously sought an extension of his travel authority to March 26, 2025, which was originally until March 10, 2025 only. The Committee members noted that Mayor Dolor was obviously skirting the legislative inquiry and thus determined that his absence during the hearing was inexcusable:

THE CHAIRPERSON: Thank you, Chairman Acop.

....

Now, we have received a copy of the excuse letter of the Mayor, and attached is the travel authority, signed by the good Governor of Batangas, Governor Mandanas, giving him the authority to travel to the United States from March 11 to March 26.

Ito lang po iyong ano—just for the record—ito lang po iyong medyo nakakapagtaka. Kasi, the first . . . supposedly the first scheduled hearing that was postponed was March 11. At na-release lahat ng invitation was March 5, 'no? Lahat ng mga invitation was released during . . . the first . . . supposedly, the first hearing was March 11, and all the invitation was released March 5, pero humingi siya ng travel authority March 11 to 26. . . .

MS. TALAG. Uhm. . . .

THE CHAIRPERSON. Eh. . . . Yes, Admin, do you want to say something?

¹⁰⁹ *Maglasang v. Ople*, 159-A Phil. 126, 130 (1975).

¹¹⁰ *Belen v. Comilang*, 705 Phil. 165, 173 (2013); *Ginete v. Court of Appeals*, 357 Phil. 36, 56 (1998).

MS. TALAG. Your Honor, actually po, *iyong travel authority is just an extension* of his previous travel authority granted by the good Governor. *The original travel authority was until . . . for until March 10. So he sought extension po of the travel authority.*

THE CHAIRPERSON. Whatever, Attorney. What I'm saying is, the invitation was sent out for March 11 hearing, March 5, but the extension was March 11 to 26. Hindi ba nakapagtataka iyon?

MS. TALAG. Your Honor, dahil nga po iyon pong travel authority would expire on March 10 . . .

THE CHAIRPERSON. Hindi nga. Whatever. *Bakit hindi na lang kumuha ulit ng travel authority after this hearing, 'di ba?* Well, in fact, the only attached documents here is the . . . the travel authority of the good Governor. *Wala pong medical*, whatever. Wala. And he was absent for the past. . . . since the very first hearing, wala po siya dito. Umiiwas iyong Mayor niyo.

.....

But anyway, with this excuse letter that was sent to us by Mayor Ryanh Dolor, this is unacceptable. Hindi ito. . . For me, this is not valid reason for him to be absent today. Pang-apat na po ito.

So, what's the pleasure of the Members of the Committee? And that includes all the Members present in the Zoom.

REP. FLORES. Mr. Chair.

THE CHAIRPERSON. Yes, Vice Chair.

REP. FLORES. Before. . . I. . . I also have to raise—I was looking at this letter kanina, eh. Una po, *he did not state what kind of medical treatment he is actually seeking*, Mr. Chair, 'no. Walang. . . Walang. . . *Wala man lang medical records*, or anything like that, to justify his absence. Second po is that *parang sinasadyang i-time 'to, iyong extension for the travel authority because we already scheduled a hearing after the expiration of the original travel authority*. So, medyo halata po na iniwasan tayo ni Mayor Dolor, eh. I don't know why, 'no, because it has been the fourth, 'no, fourth meeting na po na absent siya. . . .

.....

REP. FLORES. Ah, all right. Kasi, you know, imposible naman na in four straight hearings hindi maka-attend si mayor, eh, 'di ba, and he's a very—for me ha—important na resource person in this particular, ano, because it involves most of the actions of the LGU nga, 'no. So, the

fact that *it did not even state what kind of medical treatment he's getting, 'no, wala man lang medical records attached to justify his absence, and, for me, it's obviously just trying to avoid appearing in this Committee, Mr. Chair.*¹¹¹ (Emphasis supplied)

The Petition essentially questions the *factual* findings of the House Committee concerning Mayor Dolor's illness, which was allegedly sufficient to excuse his attendance in the Committee hearing held on March 17, 2025. As pointed out by Justice Samuel H. Gaerlan, because the Court is not a trier of facts, we cannot at the first instance evaluate the evidence submitted by petitioner concerning Mayor Dolor's illness. Rather, the Court's jurisdiction is limited to ascertaining whether the issuance of the Contempt and Detention Order was attended with grave abuse of discretion.

On this point, the Court finds that the conclusions of the House Committee find support in jurisprudence and the evidence on record. Hence, no grave abuse of discretion may be imputed to the House Committee in citing Mayor Dolor in contempt for his inexcusable non-appearance during the March 17, 2025 hearing.

It must be emphasized that in contempt proceedings, the failure of the purported contemner to appear at a scheduled hearing despite receipt of the subpoena in relation thereto would *prima facie* constitute contempt.¹¹² It is therefore the burden of the petitioner to show that the purported contemner's non-appearance in the subject proceedings may be validly excused for justifiable reasons.

In this regard, it is well-established that for an illness to constitute a valid excuse for a party's non-appearance in a hearing despite notice, the fact of illness must be established by some satisfactory *sworn* statement, either in the form of an affidavit or a certificate of a physician that satisfies the concerned tribunal of the inability of the party to be present.¹¹³ The illness must actually *disable* the person from obeying the lawful commands of the legislative body or prevent the sick person from

¹¹¹ *Rollo*, pp. 169–172, Minutes of the Meeting of House Committee dated March 17, 2025.

¹¹² *In re: Jurado*, 313 Phil. 119, 188 (1995).

¹¹³ *Fabillo v. Tionko*, 43 Phil. 317, 319 (1922), citing *Natividad v. Marquez*, 38 Phil. 608, 611 (1918).

performing their functions.¹¹⁴ Rule 30, Section 3¹¹⁵ of the Rules of Court, which applies suppletorily to the House Rules for Legislative Inquiries,¹¹⁶ specifically requires that the illness be supported by an affidavit or a sworn certification that the character of the illness is such as to render the person's non-attendance excusable.

Mayor Dolor failed to meet the foregoing requirements for his illness to constitute as a valid legal excuse for his non-appearance before the House Committee on March 17, 2025. The Court thus finds no grave abuse of discretion in the issuance of the Contempt and Detention Order.

First, Mayor Dolor repeatedly invoked his poor health condition for his non-appearance in the House Committee hearings. However, the letters dated February 12, 2025,¹¹⁷ February 24, 2025,¹¹⁸ and March 13, 2025,¹¹⁹ wherein Mayor Dolor averred that he was suffering from chest pains and hypertensive heart disease that allegedly require further medical tests and evaluation, are all unsworn.

Second, Mayor Dolor averred in his letter¹²⁰ dated March 13, 2025 that his US travel was for medical evaluation. However, as pointed out by the House Committee, no medical record was attached to the letter. Suspiciously, he requested an extension of his travel, which was originally until March 10, 2025 only, to March 26, 2025. The extension was sought after Mayor Dolor was informed as early as March 5, 2025 of the Committee hearing.

Moreover, the Authority to Travel¹²¹ that Mayor Dolor attached to the March 13, 2025 letter only mentions "personal purposes" as the reason therefor. The attached leave application form¹²² also indicates that he

¹¹⁴ See *Delos Reyes v. Cruz*, 624 Phil. 246, 254 (2010); *Office of the Court Administrator v. Asaali*, 606 Phil. 259, 268–269 (2009); *Del Monte Philippines, Inc. v. Velasco*, 546 Phil. 339, 347 (2007); *Pahilanga v. Luna*, 247-A Phil. 46, 48–49 (1988).

¹¹⁵ SECTION 3. *Requisites of motion to postpone trial for illness of party or counsel.* – A motion to postpone a trial on the ground of illness of a party or counsel may be granted if it appears upon affidavit or sworn certification that the presence of such party or counsel at the trial is indispensable and that the character of his or her illness is such as to render his or her non-attendance excusable.

¹¹⁶ HOUSE RULES FOR LEGISLATIVE INQUIRIES, sec. 19 states:

SECTION 19. *Rules of Procedure and Evidence.* – The Rules of Court shall be suppletory to these rules.

¹¹⁷ *Rollo*, p. 35.

¹¹⁸ *Id.* at 38.

¹¹⁹ *Id.* at 40.

¹²⁰ *Id.*

¹²¹ *Id.* at 41.

¹²² *Id.* at 43.

applied for a *vacation* leave, not a sick leave, to travel to the US from March 11, 2025 to March 26, 2025. Significantly, Section 53¹²³ of Rule XVI of the Omnibus Rules Implementing Book V of Executive Order No. 292 expressly allows a government employee to apply for a sick leave for a medical examination duly supported by a medical certificate. That Mayor Dolor instead applied for a vacation leave and not a sick leave for his US travel, which was supposedly for medical tests and treatments, renders his supposed illness dubious.

Third, while he claimed to be unable to attend the House Committee hearings because of his hypertensive heart disease, Mayor Dolor mentioned in his letter¹²⁴ dated January 22, 2025 that as the incumbent Mayor of the Municipality of Bauan, Batangas, he had four wedding ceremonies to officiate in the morning and in the afternoon of January 27, 2025. He even attached photos¹²⁵ of these weddings that he solemnized. This only goes to show that Mayor Dolor's illness did not disable him. Rather, despite his hypertensive heart condition, he was very much capable of attending to his duties.

Fourth, the Medical Certificate¹²⁶ that Mayor Dolor attached to his letter dated February 12, 2025 merely states that he was confined at the Cardinal Santos Hospital on February 3, 2025 for chest pains and provides an initial finding of hypertensive heart disease, without stating that his condition required continued confinement at a hospital as to prevent him from appearing before the House Committee on March 17, 2025. Importantly, the Court has ruled that *hypertension* alone would not prevent a person from performing their duty.¹²⁷ Even more, Mayor Dolor asserted that he was eventually discharged from Cardinal Santos Hospital on February 8, 2025, which precludes the finding that his illness continuously prevented him from attending to his duties.

¹²³ SECTION. *Application for sick leave.* —All applications for sick leave of absence for one full day or more shall be made on the prescribed form and shall be filed immediately upon employee's return from such leave. Notice of absence, however, should be sent to the immediate supervisor and/or to the agency head. Application from sick leave in excess of five (5) successive days shall be accompanied by a proper medical certificate.

Sick leave may be applied for in advance in cases where the official or employee will undergo medical examination or operation or advised to rest in view of ill health duly supported by a medical certificate[.]

¹²⁴ *Rollo*, p. 30.

¹²⁵ *Id.* at 54.

¹²⁶ *Id.* at 33.

¹²⁷ *People v. Tan*, 122 Phil. 641, 642 (1965).

Fifth, in his letter¹²⁸ dated February 12, 2025, Mayor Dolor was allegedly advised by his attending physician to “refrain from *prolonged travel* and stressful engagements to prevent further health risks.” Yet in his letters dated February 24, 2025,¹²⁹ and March 13, 2025,¹³⁰ Mayor Dolor mentioned that he was travelling to Singapore and the US. These inconsistent statements militate against the credibility of Mayor Dolor’s assertions.

Finally, in the letter¹³¹ dated April 10, 2025 of the House Committee, it noted the inconsistencies in the claimed inability of Mayor Dolor to attend the Committee hearings. While it recognized Mayor Dolor’s assertion that he was suffering from cardiomyopathy, it noted that his request to immediately proceed with the House Committee’s hearings was “*inconsistent* with the medical emergency cited as the basis for [Mayor Dolor’s] ongoing hospitalization.” Indeed, if Mayor Dolor’s condition rendered him incapable of attending the House Committee hearings, it is strange for him to insist that the House Committee immediately proceed with the legislative inquiry.

What may be gleaned from the foregoing is that Mayor Dolor failed to appear in the March 17, 2025 House Committee hearing allegedly because of his hypertensive heart disease. However, the purported illness lacks adequate support in the records. Moreover, Mayor Dolor’s own evidence shows that he was able to attend several weddings and travel to Singapore and the US. After being detained, he even insisted that the House Committee proceed with its hearings. In other words, Mayor Dolor’s condition did not actually disable him. As such, the House Committee cannot be faulted in refusing to consider his illness as a valid excuse for his non-appearance in the Committee hearing despite notice.

Apart from the foregoing, in the letter¹³² dated April 10, 2025, the House Committee duly considered the condition of Mayor Dolor by allowing his continued confinement at a hospital under the supervision and jurisdiction of its Sergeant-at-Arms instead of being detained in the House premises. It also explained that the hearings would resume once Mayor Dolor’s attending physicians formally clear him to return to the designated detention facility of the House. This goes to show that contrary

¹²⁸ *Rollo*, p. 35.

¹²⁹ *Id.* at 38.

¹³⁰ *Id.* at 40.

¹³¹ *Id.* at 98.

¹³² *Id.*

to petitioner's assertion, the House accorded due regard to the health condition and the due process rights of Mayor Dolor.

*6. The detention of Mayor Dolor
may exceed 10 days*

Lastly, petitioner argues that the detention of Mayor Dolor beyond 10 days is improper under Section 12 of the House Rules for Legislative Inquiries. The argument is bereft of merit.

Section 12 applies only to paragraphs (e) and (f) of Section 11 of the House Rules for Legislative Inquiries, i.e., the citation of a person in contempt for acting in a disrespectful manner towards any Member of the committee or any misbehavior in the presence of the committee, or for undue interference in the conduct of proceedings:

SECTION 11. *Contempt.* – The committee may punish any person for contempt, by a vote of two-thirds (2/3) of the Members present, there being a quorum. The following shall be grounds for citing any person in contempt:

- a. refusal without legal excuse to obey summons;
- b. refusal to be sworn or placed under affirmation;
- c. refusal to answer any relevant inquiry;
- d. refusal to produce any books, papers, documents or records that are relevant to the inquiry and are in the possession of the concerned person;
- e. acting in a disrespectful manner towards any Member of the committee or any misbehavior in the presence of the committee; or
- f. undue interference in the conduct of proceedings.

Contempt of the committee shall be deemed contempt of the House. The person cited in this section may, upon order of the committee, be detained in such place as the Chairperson or acting Chairperson may designate.

SECTION 12. *Penalty.* – By a vote of two-thirds (2/3) of the Members present, there being a quorum, those cited under Section 11, paragraphs (e) and (f) shall be detained for a period not exceeding ten (10) days in a place designated by the Chairperson or Acting Chairperson under the custody of the Sergeant-at-Arms.

Importantly, Mayor Dolor was cited in contempt by the House Committee *not* based on paragraphs (e) or (f) of Section 11, but pursuant



to paragraph (a) thereof, i.e., for refusal without legal excuse to obey summons. Thus, Section 12 does not apply to the present case and Mayor Dolor's detention by the House Committee may exceed 10 days. The detention of Mayor Dolor for contempt of the House Committee may therefore extend until the termination of the legislative inquiry subject of the present case.¹³³

All told, the House Committee did not act with grave abuse of discretion when it cited Mayor Dolor in contempt and ordered his arrest and detention due to his failure to attend the Committee hearing on March 17, 2025, despite notice. The Contempt and Detention Order was in accordance with Section 11 of the House Rules for Legislative Inquiries and is consistent with prevailing jurisprudence on when an illness may validly excuse a person from appearing in a hearing.

Further, the arrest of Mayor Dolor as an incident of the House Committee's exercise of its contempt powers during a legislative inquiry was in accordance with case law. There is therefore no basis for the Court to issue a writ of *habeas corpus* because Mayor Dolor's arrest and detention upon the order of the House Committee are valid and legal, warranting the denial of the Petition.

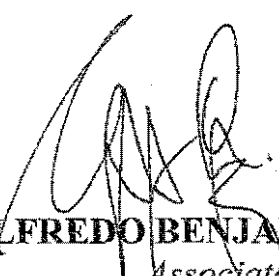
ACCORDINGLY, the Petition for *Habeas Corpus* is **DENIED**.

SO ORDERED.



HENRI JEAN PAUL B. INTING
Associate Justice

WE CONCUR:



ALFREDO BENJAMIN S. CAGUIOA
Associate Justice

¹³³ See *Balag v. Senate of the Philippines*, *supra* note 55, at 473.

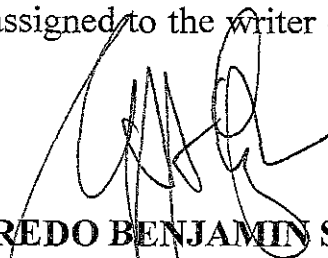

SAMUEL H. GAERLAN
Associate Justice


JAPAR B. DIMAAMPAO
Associate Justice

On leave
MARIA FILOMENA D. SINGH
Associate Justice

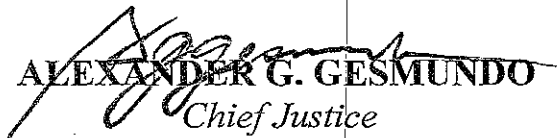
ATTESTATION

I attest that the conclusions in the above Decision had been reached in consultation before the case was assigned to the writer of the opinion of the Court's Division.


ALFREDO BENJAMIN S. CAGUIOA
Associate Justice
Chairperson, Third Division

CERTIFICATION

Pursuant to Article VIII, Section 13 of the Constitution, and the Division Chairperson's Attestation, I certify that the conclusions in the above Decision had been reached in consultation before the case was assigned to the writer of the opinion of the Court's Division.


ALEXANDER G. GESMUNDO
Chief Justice

