

REPUBLIC OF THE PHILIPPINES
Municipality of Sablan
Province of Benguet

OFFICE OF THE MUNICIPAL MAYOR

-----X

RAMON LUIS F. GARCIA,
Complainant,

Mayor Dacumos Sablan

0917 865 1597

-versus-

VERNON VERBO,
Respondent.

-----X

COMPLAINT

(For Illegal Construction and Prayer for Issuance of Demolition Order)

COMPLAINANT, through the undersigned counsel, respectfully states:

1. Complainant, RAMON LUIS F. GARCIA, is of legal age, Filipino, single, and a resident of Oppen House, Leonard Wood Road, Baguio City;
2. Respondent, VERNON VERBO, is of legal age, Filipino, married, and is unlawfully occupying a portion of a titled private property located at Lower Palali, Poblacion, Sablan, Benguet;
3. The subject property is registered under the name of the late CONCEPCION R. FUENTES, under Transfer Certificate of Title No. 016-2012000802, and Complainant is one of her legal heirs (*Documentary Exhibit "A"*);
4. Without any right, authority, or consent, Respondent entered the premises and constructed a shanty thereon sometime in 2023;
5. Respondent presented a Special Power of Attorney dated May 18, 2012, issued by one Antonio F. Garcia Jr., which merely authorizes him to "watch over and protect" the property, and does not confer any right of possession, tenancy, or construction (*Documentary Exhibit "B"*);
6. An inspection by the Municipal Engineer on October 12, 2023, confirmed the illegal occupation and construction. The Municipal Engineer's Office subsequently issued a Certification dated April 22, 2024, confirming that there is no building permit issued in the name of Vernon Verbo for said structure (*Documentary Exhibit "C"*);
7. Under Section 301 and Section 215 of Presidential Decree No. 1096, otherwise known as the National Building Code of the Philippines:

No person shall erect or construct any building or structure without a building permit;

Structures built without such permit and found to be a danger to life, property, or in violation of the Code may be

contact no.

VERNON VERBO
09466 345 825

ordered demolished by the Building Official, upon due notice and hearing;

8. The Office of the Mayor is empowered under Section 444(b)(3)(iv) of the Local Government Code (RA 7160) to enforce all laws and ordinances relative to the use of land, buildings, and structures within the municipality;
9. Respondent was issued a formal Notice to Vacate dated January 15, 2024, but refused and continues to unlawfully occupy the property (*Documentary Exhibit "D"*);

WHEREFORE, premises considered, it is respectfully prayed that your Honorable Office:

1. Issue an order referring this complaint to the Municipal Engineer/Building Official for proper proceedings pursuant to the National Building Code;
2. Upon finding of violation, issue or recommend the issuance of a Demolition Order against the illegal structure constructed by Vernon Verbo;
3. Refer the matter to the legal office of the LGU for coordination with the Philippine National Police and Barangay officials for enforcement;
4. Grant such other legal reliefs as may be just and equitable under the circumstances.

Baguio City, Philippines, 31 MAR 2025 day of March, 2025.

Respectfully submitted.

RAGUINDIN, WANGET, NEREZ LAW OFFICE

Room 205, Gamboa Building
Session Road, Baguio City
Telefax No.: 620-24-34

By:

ATTY. LESLIE D. RAGUINDIN

Roll of Attorneys No. 69994
PTR No.: 7520155 (2024), 01/03/2024, Baguio City
IBP No.: 479304, Baguio City
MCLE Compliance No.: VII-0011812, valid until April 14, 2024
Phone No.: 0927-299-8559
Email Address: leslieraguindin6@gmail.com

ATTY. NINO KRISTOFFER D. SON

Roll of Attorneys No.: 93819
PTR No.: 7826973 (2025), 03/11/2025, Baguio City
IBP No.: 524191, Baguio City
MCLE Compliance (Exempt – Newly Admitted Member February 1, 2025)
Phone No.: 0917-417-2573
Email Address: nino.kristofferson111@gmail.com

Copy Furnished: (By REGISTERED MAIL)

VERNON VERBO
Lower Palali, Poblacion, Sablan, Benguet;

RD
Date:
Baguio City

REPUBLIC OF THE PHILIPPINES)
CITY OF BAGUIO))S.S
X_____X

VERIFICATION/CERTIFICATION

I, **RAMON LUIS F. GARCIA**, of legal age, Filipino, single, residing at Oppen House, Leonard Wood Road, Baguio City, after being duly sworn, depose and state:

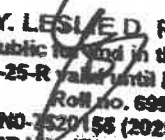
1. That I am the Complainant in the above-entitled case;
2. That I caused the preparation of the foregoing Complaint;
3. That I attest that the allegations therein are true and correct of my own knowledge and belief, and based on authentic records;
4. That I certify that I have not commenced any other action or proceeding involving the same issue in any court, tribunal or quasi-judicial agency, and that to the best of my knowledge, no such other action or proceeding is pending therein;
5. That I hereby undertake to notify this Honorable Court within five (5) days from notice should I learn that a similar action or proceeding has been filed or is pending before any court, tribunal or quasi-judicial agency; and,
6. That I hereby execute this verification in compliance with Sections 4 and 5 of Rule 7 of the Revised Rules of Court and in compliance with Rule 37 thereof.

In witness whereof, I hereunto set my hand this 31 MAR 2025 day of March, 2025 at Baguio City.


RAMON LUIS F. GARCIA 31 MAR 2025

SUBSCRIBED AND SWORN TO before me this 31 MAR 2025 day of March, 2025 at Baguio City. The affiant exhibited to me an integrally complete and competent proof of her identity, bearing her signature and picture.

Doc No: 160
Page No: 33
Book No: XVI
Series of 2015


ATTY. LESLIE D. RAGUINDIN
Notary Public for and in the City of Baguio
NA-26-NC-25-R valid until December 31, 2026
Roll No. 69994
PTR NO. 7520155 (2023) 11/27/2024
IBP No. 479304; 11/27/2024
Room 205 & 304 Garboa Building, 118 Session Road, Baguio City
Mobile No. 0927-290-4553

REPUBLIC OF THE PHILIPPINES
DONE IN THE CITY OF BAGUIO)) S.S

AFFIDAVIT OF SERVICE

I, **BRYLLE OLEGARIO**, of legal age, Filipino citizen, with office address at Room 205, Gamboa Building, Session Road, Baguio City, after having been duly sworn to in accordance with law, hereby depose and state that:

1. I am the legal secretary of the **RAGUINDIN, WANGET, NEREZ LAW OFFICE** with address at Room 205, Gamboa Building, Session Road, Baguio City;
2. That on the MAR 31 2025, I served one (1) copy of the complaint to the following parties via registered mail service and electronic mail:

VERNON VERBO

Lower Palali, Poblacion, Sablan, Benguet


3. Attached to this Affidavit of Service is the printed proof of transmittal to the Respondents pursuant to Section 17(d) of the above-mentioned rule, which transmittal contains the subject of the electronic mail as follows: case number, case title and the pleading, order, or document title, the party or parties filing or serving the paper, nature of the paper, party or parties against whom relief, if any, is sought, and the nature of the relief sought, all in accordance with Section 12 of the same rule contemplated hereto.

IN WITNESS WHEREOF, I have hereunto set my hand this 31 MAR 2025 day of 2025, in the City of Baguio, Philippines.


BRYLLE OLEGARIO
AFFIANT

SUBSCRIBED AND SWORN TO before me this 31 MAR 2025 day of 2025 in the City of Baguio, affiant is personally known to the notary,

Doc. No. 161
Page No. 34
Book No. IV
Series of 2025.


ATTY. LESLIE D. RAGUINDIN
Notary Public for the City of Baguio
NA-26-NC-25-R valid until December 31, 2026
Roll no. 69994
PTR NO-7520455 (2024) 11/27/2024
IBP NO. 479304; 11/27/2024
Room 205 & 204 Gamboa Building, 118 Session Road, Baguio City
Mobile No. 6327-233-4559

REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF JUSTICE
Land Registration Authority
QUEZON CITY

Registry of Deeds for La Trinidad, Benguet

Transfer Certificate of Title

No. 016-2012000802

IT IS HEREBY CERTIFIED that certain land situated in BARANGAY OF PALALI, MUNICIPALITY OF SABLAN, PROVINCE OF BENGUET, ISLAND OF LUZON, bounded and described as follows:

A PARCEL OF LAND (LOT 2-A-3-A-1, PSD-CAR-019913) BEING A PORTION OF LOT 2-A-3-A, (LRC) PSD-280900; SITUATED AT RURBAN CODE 131112, BARANGAY OF PALALI, MUNICIPALITY OF SABLAN, PROVINCE OF BENGUET, ISLAND OF LUZON. BOUNDED ON THE E., ALONG LINES 1-2-3 BY PROVINCIAL ROAD; ON (continued on next page)

is registered in accordance with the provision of the Property Registration Decree in the name of

Owner: CONCEPCION R. FUENTES, WIDOW, OF LEGAL AGE
Address: DOMINICAN HILL, BAGUIO CITY, PHILIPPINES

as owner thereof in fee simple, subject to such of the encumbrances mentioned in Section 44 of said Decree as may be subsisting.

IT IS FURTHER CERTIFIED that said land was originally registered as follows:

Case No.: 144	Record No.: 52048
Orig. Reg. Date: 02 21 1952	Decree No.: 6536
Original RD: LA TRINIDAD, BENGUET	OCT No.: OCT-O-9-
Volume No.: A-3	Page No.: 9
Original Owner: ADELA A. VDA. DE ROMERO	

This certificate is a transfer from TRANSFER CERTIFICATE OF TITLE T-20174 (TOTALLY CANCELLED) by virtue hereof in so far as the above-described land is concerned.

Entered at La Trinidad, Benguet, Philippines on the 8th day of DECEMBER 2011 at 03:20pm.

Juanito Kibatay Ampaguey
Register of Deeds

It is hereby certified that this is a true electronic copy of TCT 2012000802 on file in Registry of Deeds of La Trinidad, Benguet, which consists of 2 page(s). This is a system-generated Certified True Copy, and does not require a manually-affixed signature. Printed at Registry of Deeds of La Trinidad, Benguet Requested By: BRENDA LYN BERNAL

Ref. 2023002648 OR No. : 1028477832
Date : 03/14/2023 OR Date : Mar 14 2023
Time : 01:32:40 PM Amt Paid : 196.97



LR A 1106591616

TCT No.: 016-2012000802

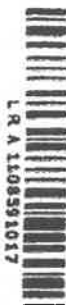
Page No.: 2

TECHNICAL DESCRIPTION (Continued from page 1)

THE SE., ALONG LINES 3-4-5 BY LOT 2-A-3-B, (LRC) PSD-280900; ON THE NW., ALONG LINES 5-6-7 BY LOT 2-A-3-A-2 OF THE SUBD. PLAN; ON THE NE., ALONG LINES 7-8-1 BY LOT 2, F-52843, PICTOL PACALSO. BEGINNING AT A POINT MARKED "1" ON PLAN BEING N. 54 DEG. 09 MIN. E., 2088.64 M. FROM BLBM NO. 1, BO. OF LIBTONG, DISDIS, SABLAN, TO CORNER 1, THENCE: S. 05 DEG. 35 MIN. E., 119.33 M. TO POINT 2; S. 05 DEG. 35 MIN. E., 5.10 M. TO POINT 3; S. 73 DEG. 23 MIN. W., 101.00 M. TO POINT 4; S. 83 DEG. 39 MIN. W., 120.21 M. TO POINT 5; N. 18 DEG. 44 MIN. E., 5.52 M. TO POINT 6; N. 18 DEG. 44 MIN. E., 217.68 M. TO POINT 7; S. 68 DEG. 42 MIN. E., 121.59 M. TO POINT 8; S. 86 DEG. 22 MIN. E., 19.22 M. TO POINT OF BEGINNING. CONTAINING AN AREA OF THIRTY THOUSAND (30,000) SQUARE METERS, MORE OR LESS. ALL POINTS ARE MARKED ON THE GROUND BY PS. CYL. CONC. MONS. 15 X 40 CMS., EXCEPT COR. 1, 3, 4, 8 & 1 BY PLS. CYL. CONC. MONS. 15 X 60 CMS. BEARINGS TRUE; DATE OF ORIGINAL SURVEY ON JUNE 4-6, 1924; DATE OF SUBDIVISION SURVEY ON OCT. 15, 2011; EXECUTED BY ENGR. MARIO R. FIGUERRES AND WAS APPROVED ON NOVEMBER 14, 2011.
NOTE: THIS LOT IS SUBJECT TO PERPETUAL RIGHT OF WAY (5.00 M. WIDE) WHICH ENCOMPASSES ALONG LINES 2-3-4-5-6-2.

It is hereby certified that this is a true electronic copy of TCT 2012000802 on file in Registry of Deeds of La Trinidad, Benguet, which consists of 2 page(s). This is a system-generated Certified True Copy, and does not require a manually-affixed signature. Printed at Registry of Deeds of La Trinidad, Benguet. Requested By: BRENDA LYN BERNAL

Ref. : 2023002648 OR No. : 1026477832
Date : 03/14/2023 OR Date : Mar 14 2023
Time : 01:32:40 PM Amt Paid : 196 97





Republic of the Philippines
Province of Benguet
Municipality of Sablan
OFFICE OF THE MUNICIPAL ENGINEER

Exhibit "B"

Annex "B"

SPECIAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS:

THAT I, ANTONIO F. GARCIA JR., Filipino, of legal age and resident of 92 General Luna Road, Baguio City, Philippines,

have named, constituted, and appointed, and by these presents do name, constitute, and appoint

VERNON VERBO, Filipino, of legal age, married and resident of Sablan, Benguet, Philippines,

as my true and lawful attorney-in-fact for me and in my name, place and stead to do and perform the following acts and things namely:

1. To watch over and take care of the farmland consisting of the following:

Parcel I - A parcel of land containing an area of 78,442 square meters, situated in Palali, Sablan, Benguet, and covered by Transfer Certificate of Title No. T-20174, registered in the name of Concepcion R. Fuentes; and

Parcel II - A parcel of land containing an area of 16,930 square meters, and which is a portion of Lot 948, situated in Librang, Burgos, La Union, covered by Assessment of Real Property (ARP) 2009-08-0009-00003 in the name of Adela Aguilado yda. de Romero;

2. To protect the farmland from and/or prevent the entry therein of intruders and squatters;

3. To protect the plants and trees in the land from destruction or damage by humans, animals, fire and others;

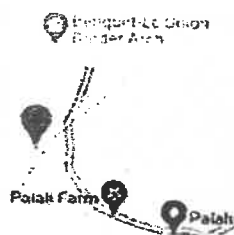
4. To protect all water source and springs found on the land from destruction and pollution; and

5. To report immediately to police authorities, barangay officials, and owners of the land any and all crimes committed and/or any and all untoward incidents in the land.

HEREBY GIVING AND GRANTING unto my said attorney full power and authority to do and perform every act and thing whatsoever requisite and necessary to be done in and about the premises, as fully to all intents and purposes as I might or could do if personally present, and hereby ratifying and confirming all that my attorney shall lawfully do or cause to be done by virtue of these presents.

IN WITNESS WHEREOF, I have hereunto set my hand this 18th day of May 2012, at Baguio City, Philippines.

ANTONIO F. GARCIA JR.
Principal



Google

Naguilian Rd, Burgos, La Union, Philippines

Burgos

Ilocos Region

Philippines

28°C

82°F

2023-10-12 Thu 10:57 AM



CERTIFICATION

To whom it may concern:

This is to certify that upon verification of records on file, there is NO BUILDING PERMIT issued under the name of VERNON VERBO located at Lower Palati, Poblacion, Sablan, Benguet.

This Certification is being issued on the 22nd of April, 2024 at Municipal Hall, Poblacion, Sablan, Benguet.


JAMAICA P. ABUAN

Engineer II
OIC-Municipal Engineer
Designated Building Official

Amount: ₱51.50

OR No. 8346725

Date: 23 APR 2024

- Annex "A" and "A-1"-Photos during inspection dated October 12, 2023;
- Annex "B" -Special Power of Attorney presented by Vernon Verbo.



**RAGUINDIN
WANGET
NEREZ**
LAW OFFICE

OFFICE ADDRESS:
Rm 205 Gamboa Building, 175 Upper Session Road
Baguio City, Philippines 2600

CONTACT INFORMATION:
(074) 620 24 34
rwnlawoffice@gmail.com

Exhibit "D"

March 28, 2025

MR. VERNON VERBO

Lower Palali, Poblacion
Sablan, Benguet

RL 014 723 501 22

03-31-25

Subject: FINAL DEMAND TO VACATE AND REMOVE ILLEGAL STRUCTURE

Dear Mr. Verbo,

This serves as a **FINAL DEMAND** for you to immediately vacate the property located at Lower Palali, Poblacion, Sablan, Benguet, covered by Transfer Certificate of Title No. 016-2012000802 in the name of the late Concepcion R. Fuentes.

As one of the lawful heirs and successors-in-interest, I, Ramon Luis F. Garcia, now assert our lawful right to physical possession of said property. You have unlawfully occupied the property and constructed a structure without our consent or any building permit, in violation of the National Building Code (PD 1096).

You presented a Special Power of Attorney from Mr. Antonio F. Garcia Jr., which does not authorize you to occupy, possess, or build on the property. Despite our prior demand, you continue to occupy the property, depriving us of its lawful use.

You are hereby given a non-extendible period of **five (5) days** from receipt of this letter to:

1. **Voluntarily vacate** the premises;
2. **Demolish and remove** any and all illegal structures constructed;
3. **Cease all acts of possession or claim** over the subject property.

Failure to comply shall constrain us to take appropriate legal action, including filing a case for **ejectment**, and pursuing administrative and criminal remedies under the National Building Code and the Revised Penal Code.

Sincerely,

Atty.  **Leila D. Raguindin**

Raguindin, Wanget, Nerez Law Office
Room 205, Gamboa Building, Session Road
Baguio City, 2600, Benguet, Philippines



Republic of the Philippines
Province of Benguet
Municipality of Sablan
OFFICE OF THE MUNICIPAL ENGINEER

November 24, 2023

ATTY. GERONIMO R. EVANGELISTA, JR.

Counsel for the Heirs of Cencepcion R. Fuentes
No. 121 M. Roxas St., Baguio City
Tel. 443 5969 / Cell 09398658309
Email: greir25@gmail.com

Dear Atty. Evangelista:

This is concerning your letter dated September 15, 2023, regarding the alleged illegal shanty built by Mr. Vernon Verbo located at Lower Palali, Poblacion, Sablan, Benguet.

Verification from the office file revealed that there is no Building Permit issued under the name of Mr. Vernon Verbo for his construction of the subject structure located at Lower Palali, Poblacion, Sablan, Benguet.

On October 12, 2023, during the ocular inspection, Mr. Vernon Verbo admitted that he is the owner and occupant of the subject structure. He also claims that he is authorized to construct the subject parcel of land. He presented a special power of attorney from Mr. Antonio F. Garcia Jr. and a lot plan the same as the one you have attached in your complaint letter.

In view hereof, this office will attach a photograph of the above-mentioned special power of attorney for your comment and validation.

For your information and guidance.


JAMAICA F. ABUAN
Engineer II
OIC-Municipal Engineer

Noted by:


ALFREDO B. DACUMOS, JR.
Municipal Mayor

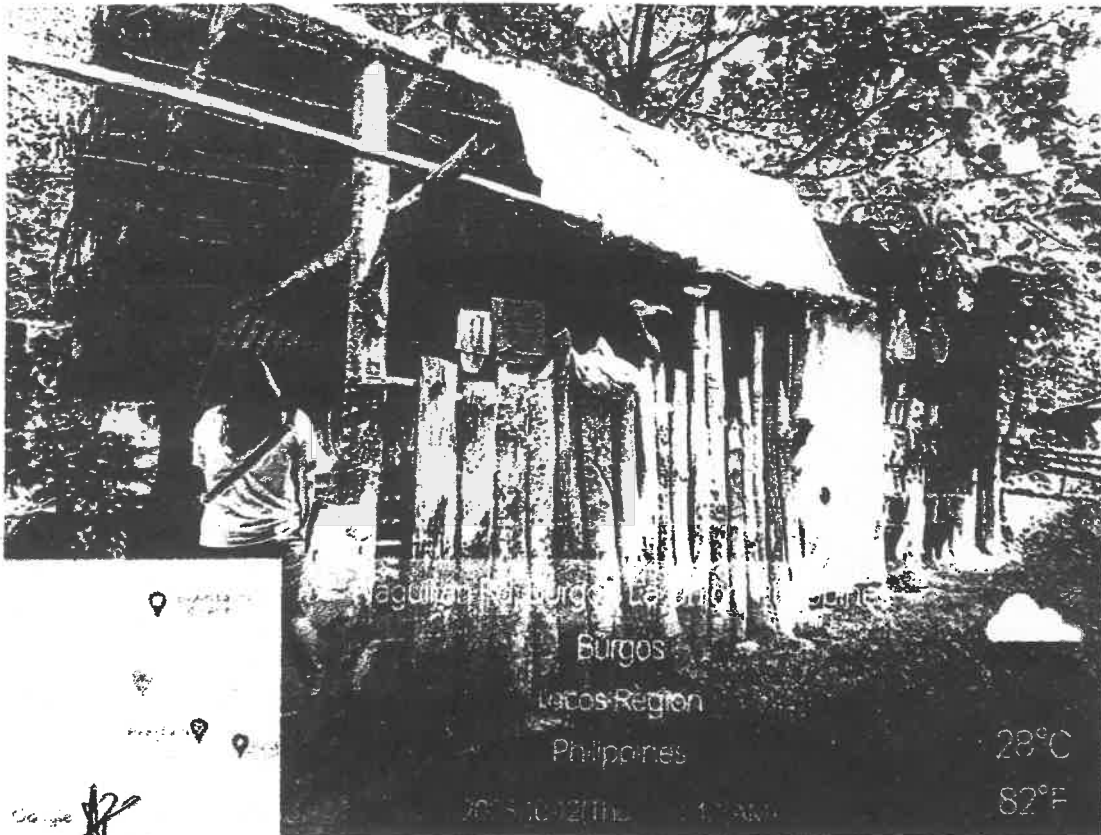
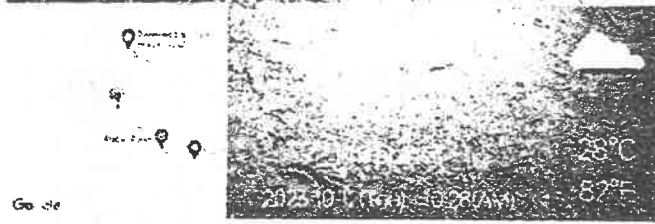
Attachments:

- Annex "A" and "A-1"-Photos during inspection dated October 12, 2023;
- Annex "B" -Special Power of Attorney presented by Vernon Verbo.



Republic of the Philippines
Province of Benguet
Municipality of Sablan
OFFICE OF THE MUNICIPAL ENGINEER

Annex "A"



Go to



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Annex "A-1"



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Annex "A"

