

Republic of the Philippines  
**REGIONAL TRIAL COURT**  
Fifth Judicial Region  
*Branch \_\_\_\_\_ at Naga City*

**SOLIMAN M. SANTOS, JR.,**  
**LEO L. INTIA,**  
**LUIS RUBEN M. GENERAL, and**  
**WINSTONEY MARIE SA. SALCEDA-MAZO**  
Plaintiffs

- versus -

**Civil Case No. \_\_\_\_\_**  
For: **INJUNCTION with**  
**APPLICATION for TEMPORARY**  
**RESTRAINING ORDER, WRIT OF**  
**PRELIMINARY PROHIBITORY**  
**AND MANDATORY INJUNCTION**

**NAGALAND DEVELOPMENT**  
**CORPORATION,** represented by its  
Chairman Emeritus Atty. William T. Enrile  
or his son Atty. William R. Enrile II, or Asst.  
to the Chairman Federico Aldo Lazaro; and  
**CITY GOVERNMENT OF NAGA,**  
represented by Mayor Maria Leonor G.  
Robredo

Defendants

x - - - - - x

**VERIFIED COMPLAINT**

Heritage is our legacy from the past,  
what we live with today, and  
what we pass on to future generations.  
Our cultural and natural heritage are both  
irreplaceable sources of life and inspiration.

The concept of the public welfare is broad and inclusive.  
The values it represents are spiritual as well as physical,  
aesthetic as well as monetary. It is within the power of the  
legislature to determine that the community should be  
beautiful as well as healthy, spacious as well as clean,  
well balanced as well as carefully patrolled.

- Justice William O. Douglas in *Berman v. Parker*

To make us love our country,  
our country ought to be lovely.  
- Edmund Burke<sup>1</sup>

**PLAINTIFFS** respectfully allege that:

*The Case*

[1] This is an ordinary Civil Case Complaint for INJUNCTION with Application for Temporary Restraining Order, Writ of Preliminary Prohibitory and Mandatory Injunction, and Other Just and Equitable Remedies [a] to stop the ongoing construction of defendant Nagaland Development Corporation's new two-storey commercial building fronting and blocking the main street view (along the lot's whole Peñafrancia Avenue frontage) of Naga City's two remaining Spanish-era civil building ruins ("*Naga Ruins*" for short) that are LGU-declared Important Cultural Properties (ICPs); [b] to undo, including demolish, as needed, whatever construction obstructing or bound to obstruct the view of the Naga Ruins; and [c] to suspend, in aid of that purpose, the Building Permit No. 0970-2511-0835 for that commercial building issued by defendant City Government of Naga.

[2] The Nagaland commercial building construction fronting and blocking the main street view of the two Naga Ruins ICPs: [a] will prejudice the heritage value and importance (in other words, **heritage justice**) due the two Naga Ruins ICPs, [b] would aggravate Naga City flooding in that area near the Naga River due to the extensive cementing involved (in other words, **environmental justice**), and [c] the building permit was issued despite the lack of certain important requirements (e.g. Heritage Impact Assessment, Archeological Impact Assessment, Environmental Impact Assessment). These offenses and violations are **CONTRARY TO LAW and PUBLIC POLICY**, at both the national and local levels, as well **CONTRARY TO JUSTICE AND EQUITY**. These offenses and violations would work injustice to the plaintiffs, their rights and duties, and to the Naga Ruins. There is an urgent need to prevent irreparable visual, physical, integrity injury to the Naga Ruins as well as irreparable injury to the heritage and environmental rights and duties of the plaintiffs. The relevant constitutional provisions, national laws, and local ordinances, resolutions and executive policy issuances, jurisprudence, and a most applicable National Historical Commission of the Philippines (NHCP) *Guidelines, Policies and Standards for the Conservation and Development of Historic Centers/ Heritage Zones*, as well as certain just and equitable considerations (e.g. **property and development equity**), including viable alternatives available to Nagaland and the City Government, provide **sufficient aides or guides** for the Court to render an injunction judgment.

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<sup>1</sup> These were the three opening quotes in the Dissenting Opinion of Justice Jardeleza in the Supreme Court Decision in the Torre de Manila case of *Knights of Rizal vs. DMCI Homes, Inc., et al.*, 809 Phil. 453 (2017), which this Complaint adopts in letter and in spirit. The first quote is from the UNESCO World Heritage Centre.

## The Parties

### *Plaintiffs*

**[3]** SOLIMAN M. SANTOS, JR. and LEO L. INTIA are both retired Judges of the Regional Trial Court of Naga City; LUIS RUBEN M. GENERAL, is a private law practitioner of long standing in Naga City; and WINSTONEY MARIE SA. SALCEDA-MAZO is an architect, environmental planner, and a private law practitioner in Naga City. They are all Filipino citizens who have had or continue to have residences and land in Naga City. They have all contributed in various ways to the social, political, economic, environmental, and cultural progress of Naga City. Plaintiffs Salceda-Mazo and Santos are leading Naga City historical, cultural and architectural heritage advocates on the Naga Ruins-Nagaland issue of recent years, through several civil society organizations, namely the Nueva Caceres Heritage Movement, Inc. (NCHMi), the United Architects of the Philippines (UAP) Camarines Chapter, and the Naga City Arts and Culture Coalition (NCACC).

**[3.1]** All of the plaintiffs are taxpayers, and except plaintiff Salceda-Mazo, are also senior citizens. All of them, individually and collectively, have *locus standi*, primarily on the basis of “the duty of every citizen to preserve and conserve the Filipino historical and cultural heritage and resources,”<sup>2</sup> and secondarily as Legal Guardians and Responsible Stewards of the Naga Ruins.<sup>3</sup>

**[3.2]** Finally, all the plaintiffs together are also their own collective counsels. They may be served with court processes and other papers through GeneraLaw Abogados (law office of plaintiff General) at Units 201-202, Galleria de San Francisco, Peñafrancia Ave., Naga City.

### *Defendants*

**[4]** NAGALAND DEVELOPMENT CORPORATION (“Nagaland”) is a private family business and commercial property corporation, usually represented by its Chairman Emeritus Atty. William T. Enrile, though sometimes by his son Atty. William R. Enrile, II or by Federico Aldo Lazaro, Assistant to the Chairman, and with the given address at 116 Abella St., Naga City, where it / they may be served with summons and other court processes. Nagaland is now undertaking the ground preparation for the subject construction of a new two-story commercial building along the whole

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<sup>2</sup> Per Section 2 of RA 7356, the Law Creating the National Commission for Culture and the Arts (NCCA), as pointed out by Justice Leonen in his Concurring Opinion in *Knights of Rizal vs. DMCI Homes, Inc.*, the Torre de Manila Case.

<sup>3</sup> Like as asserted by the two human being petitioners on behalf of the Lesser Life Forms in *Resident Mammals of the Protected Seascape Tañon Strait vs. Secretary Angelo Reyes, et al.*, 758 Phil. 724 (2015).

Peñafrancia Ave. frontage of the lot that would block the main street view of the Naga Ruins.

[5] CITY GOVERNMENT OF NAGA (“CGN”) is the Local Government Unit (LGU) of Naga City, represented by its local chief executive Mayor Maria Leonor G. Robredo with office at the 2<sup>nd</sup> Floor, City Hall, J. Miranda Ave., Naga City, where it/ she may be served with summons and other court processes. The CGN includes other executive offices/officials such as the Acting City Engineer / Building Official, formerly Elmer T. Albo who issued the subject building permit for the subject Nagaland new commercial building in November 2025. The CGN also includes the local legislative body, the Sangguniang Panlungsod (SP), which declared the Naga Ruins as Important Cultural Properties (“ICPs”) in May 2024 under the previous city administration, and more recently in 2025 through its Committee on Cultural and the Arts, chaired by Councilor David Casper Nathan A. Sergio, which conducted several hearings and a Public Presentation on the Nagaland plan for conservation and development of the Naga Ruins heritage site. Both defendants have full civil capacity.

#### Key Facts and Documents

[6] As an **Introductory Note**, plaintiffs present here, for the purposes of this Complaint, the most salient facts and documents, most of which are uncontested, including certain documents, especially as to their existence, if not also their contents. Not all pertinent facts presented here are supported by documents but may still be matters of public knowledge, of unquestionable demonstration, or of simple admission. The narration here is not a complete history of the matter but would suffice for purposes of this Complaint. As this is a **verified** Complaint, this section “Key Facts and Documents” may **also serve the plaintiffs’ collective Judicial Affidavit**, aside from the **separate JAs of plaintiffs Santos and Salceda-Mazo**.

[7] The Provincial Government had once used one of the Ruins as a Provincial Jail, among other public buildings in the lot, including the old Post Office of Naga City. Sometime in 2020, Nagaland purchased the lot from another private corporation Philamlife which had earlier bought it from the Provincial Government of Camarines Sur. To be clear, this Complaint does not necessarily acknowledge the validity of those sales which is an issue entirely different from this injunction case.

[8] On November 16, 2022, the National Historical Commission of the Philippines (NHCP) wrote to Nagaland that “It has come to our attention that there is an **ongoing demolition** of the two Spanish-era buildings which served as the *Administracion Postal de Coreo* in Barangay San Francisco, Naga City.... we, therefore, issue a **Cease-and-Desist Order** (CDO), suspending all activities involving the demolition of the said buildings,” which the NHCP treated as “considered” or “presumed” ICPs for being structures aging at least 50 years old per Section 5(f) of the National Cultural Heritage Act, and “Thus,

the said heritage site must be preserved from modification or demolition. Any proposed development which might affect the historical and architectural integrity must be consulted first with the appropriate national agencies such as the NHCP.” [This NHCP letter is appended as *Annex/ Exh. A.*]

[9] At this point, it must be pointed out that the two Spanish-era buildings are **more than 50 years old**. “Spanish-era” which ended in 1898 connotes at least 127 years old up to 2025. Nagaland itself, through its submitted commissioned Conservation (Management) Plan in 2025, stated that one building, “the *Almacen* or Storehouse has... a coral stone marker stating the completion of the building in 1846.” This therefore becomes **at least 180 years old** this 2026. But another account by local journalist and historian Jose Fernando P. Obias,<sup>4</sup> after himself ocularly examining the same marker when it was in much better physical integrity condition sometime not later than 2009, believes that the year indicated was not 1846 but 1826. Which makes the building **200 years old** this 2026 -- **no less than a bicentennial** that should be celebrated but then also mourned due to its appreciable physical integrity deterioration in recent years, most sadly while in the custody of Nagaland (as photographs over recent years would show).

[10] Subsequent to the abovesaid CDO, Nagaland petitioned the NHCP to lift the CDO, and relatedly to remove the presumption of important cultural property that was applied to the Naga Ruins, basically a **move to delist** them from NHCP list of ICPs. On 10 January 2024, the NHCP wrote to Nagaland that its petition to remove the ICP presumption of the Naga Ruins could not be processed because it “**found that the said structures have been designated as local heritage sites through Sangguniang Panlungsod Resolution No. 2014-038 and also, are protected by Naga City Ordinance No. 2003-003. Moreover, these are included in the *Philippine Registry of Heritage* (former *Philippine Registry of Cultural Properties* or PRECUP).** Hence, we cannot process the petition until the structures are delisted in the PRECUP and the previous resolution and ordinances are repealed.” [This NHCP letter is appended as *Annex/ Exh. B.*]

[10.1] The abovesaid NHCP letter recognized **SP Resolution No. 2014-038** that “**declared[d]** the old ruins at Barangay San Francisco as heritage structures **and the parcel of land wherein these structures are erected as heritage site**, and mandating their protection and conservation pursuant to Republic Act No. 10066” (the National Cultural Heritage Act of 2009). [This SP Resolution is appended as *Annex/ Exh. C.*] Naga City Ordinance No. 2003-003 “Creating the Historical and Cultural Landmarks Preservation Task Force” specifically identifies “The Two (2) Stone Buildings at the Old Post Office site” as among the subject “historical and cultural buildings and structures” for preservation and restoration.

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<sup>4</sup> See Jose Fernando Pelonio Obias, *Spanish Souvenirs: The Spanish Bells, Belfries, and Buildings in Camarines Sur* (2009, unpublished, since re-titled *Hispanic Heritage in Camarines Sur*), esp. pp. 94-96, the section “Obras Pias Building in Naga City.”

**[10.2]** These SP Resolution and Naga City Ordinance were never repealed, and on the contrary were subsequently reiterated and thus validated in more recent resolutions and ordinances, particularly as stated below.

**[11]** Then comes **the most significant local heritage development regarding the Naga Ruins so far**. On May 7, 2024, after sustained efforts by seven named Naga City heritage advocate groups and likewise sustained resistance by Nagaland, the **Sangguniang Panlungsod (“SP”)** finally passed **Resolution No. 2024-264** “that the two (2) Spanish-era stone buildings in Barangay San Francisco along Peñafrancia Avenue in Naga City be **declared as important cultural properties (ICPs)** as they **hold local historical, socio-cultural and architectural significance and therefore are invaluable part of the city’s rich heritage and history.**”

**[11.1]** The said indubitable “local historical, socio-cultural and architectural significance” that “are [an] invaluable part of the city’s rich heritage and history” is substantiated in detail in the various reference materials (Annexes A to N) referred to in the Resolution. [This SP Resolution without the said Annexes is appended as *Annex/Exh. D*, though those Annexes may be provided, if needed by the Court.]

**[12]** The **importance of the Naga Ruins** lies not only on their being the only remaining Spanish-era civil buildings left in Naga City that is touted as “a Sixteenth Century Spanish City.” Their use in Naga’s history was not only as a Spanish colonial period Barracks (*Cuartel*) and Storehouse (*Almacen*), as highlighted by Nagaland. As the abovesaid SP Resolution reference materials Annexes show, the two old buildings were used as *Administracion del Correo* complex with postal office and telegraphic station, as charitable foundation, as prison of the city or of the province, as torture chamber, as war room, as infirmary, as hospital, as schools superintendent’s office, as public library, or as what have you, **during two centuries of history, culture and life in Naga City from 1826** during Spanish rule, through American rule, the Commonwealth period, the Japanese occupation and the post-war independent Third Republic of the Philippines up to the more recent decades of rapid urban development.

**[12.1]** One of the abovesaid SP Resolution reference materials, ***CORREO: Conveying a Relic into the Future*** by U.P. architects Casey Niña Y. Abalayan (also of Naga City) and Markel Cesar A. Luna (University of the Philippines, Diliman, Quezon City, 2023), is an excellent architectural expert report publication based on field work at the two buildings ruins in 2020. This was referred to as Annex B in the abovesaid SP Resolution.

**[12.2]** To quote from *CORREO*: “The sheer rarity of these Spanish-period structures represent a scarce research and education

value that, once lost, can never be recovered” (*underscoring supplied*). The report presents the significance of the two buildings ruins as “Representation of History,” “Childhood Memories and Nostalgia,” and “Part of Naga City’s Vistas.” These show the requisite combination of not only historical but also cultural and architectural values that make for heritage properties.

[13] Instead of furthering that “local historical, socio-cultural and architectural significance” of the Naga Ruins, in September 2024, a **Peñafrancia Fiesta carnival** with the usual roller-coaster and other rides was allowed by Nagaland and the CGN to be held **at the lot grounds in the vicinity of the Naga Ruins**. Not only did various carnival rides and structures violate the minimum 5-meter buffer zone for the two Spanish-era buildings but these were used for makeshift living quarters of the carnival personnel and for storage of some carnival equipment and supplies. Photographs of that time and place would show this.

[14] In the meantime, on October 22, 2024, **Typhoon Kristine hit Naga City** with heavy torrential rains and **flooding never before experienced here**, and which has become and continues to be **the latest collective trauma of its residents**. The heavy flooding did not spare downtown Naga or its *centro*. Among the business establishments here that suffered basement parking and first floor flooding were the Nagaland commercial buildings just across the street from **the Naga Ruins heritage site, with the overflowing Naga River just 10 meters to the rear of it.**

[14.1] Among those commercial buildings that got flooded were the Emall and the Starmark Hotel and Cafe along Penafrancia Ave., and Café, and the Nagaland Hotel with its White Bean Café along Elias Angeles St. The recurrent flooding in those places, not limited to the Typhoon Kristine event but also in previous and subsequent rainfall events of even lesser volume, is a matter of local public knowledge, as well as much online photo/video-documentation.

[15] On February 24, 2025, Nagaland filed with the CGN an **application for building permit for its planned new two-storey commercial building** along the whole frontage of its lot where the Naga Ruins are located. The indicated architect is Caroline Enrile, and the indicated applicant is Atty. William R. Enrile II. [This Nagaland application for new commercial building is appended as *Annex/Exh. E.*]

[15.1] On February 26, 2025, Nagaland’s architect Joel Vivero Rico submitted on its behalf to the NHCP a 71-page **“Conservation Management Plan: Old Spanish Barracks and Storehouse”** with a cover letter by Ar. Rico dated February 25, 2025 [hereinafter the **“Nagaland Plan,”** which is appended as *Annex/Exh. F.*]. This appears to have also been submitted by Nagaland to the CGN, particularly to the Building Official, for building permit application purposes.

**[15.2]** Later, on June 15, 2025, Nagaland filed with the CGN **two more applications for building permit, this time for the repair (by adaptive reuse) of the two old Spanish-era building ruins.** The indicated architect is Joel V. Rico, but no indicated applicant. [These two Nagaland applications for repair of two old buildings, “almacen” and “cuartel” respectively, are appended as *Annexes/ Exhs. G & G-1.*]

**[16]** The **Nagaland Plan** was, to its credit, an indication that it had **ostensibly shifted its position from demolition to avowed heritage conservation of the Naga Ruins**, as “Atty. Enrile and his family expressed their intention of developing the complex amplifying the importance and historical value of those structures in the heritage of Naga” (*Nagaland Plan*, p. 19). It even graciously gave some credit to the “concern [of] both local heritage advocates and Naga City administration” (p. 3), that “in 2022, several heritage advocates in Naga City showed concern to the possible demolition of the two old structures in the site and was supported by the Naga City Local Government and the National Historical Commission of the Philippines...” (p. 19).

**[16.1]** This is a **recognition that there are these other stakeholders** of “the two ruined heritage structures within the property of Nagaland Development.” It also to its credit, related this to a brief history of Naga City, and discussed extensively **the architectural, cultural, social, and historical significances of the Old Barracks (Cuartel) and Old Storehouse (Almacen)** – and thus the heritage importance and value of the Naga Ruins should no longer be an issue in this case.

**[16.2]** The Nagaland Plan commendably contained sections on “Damage Assessment” and “Restoration Methodology” that may be built on, but there is yet no Archeological Impact Assessment (AIA) as required by the NHCP. The Nagaland Plan also contained a section on “Preservation and Maintenance Guidelines” but these are general guidelines of heritage conservation and of the NHCP, not yet a specific Conservation Management Plan for the Naga Ruins, despite the use of that term CMP in the very title of the Nagaland Plan.

**[17]** But going now to **THE CRUX OF THE MATTER**, the Nagaland Plan presents as its centerpiece a proposed “**Paseo de Nueva Caceres Heritage Complex**” for the whole 4,991 square meters lot it calls the “**Nagaland Heritage Property.**” At the avowed “core of its development” as such, the plan is for the conservation by **adaptive reuse of the two old Spanish Barracks (Cuartel) and Storehouse (Almacen).** However, in front of these Naga Ruins, Nagaland plans (and has started) to construct a **new two-storey commercial building along the whole Peñafrancia Ave. frontage of the lot**, thereby effectively blocking the frontal and main street view of the Ruins.

**[17.1]** The frontal placing of this new commercial building and its naming as the “**Paseo de Nueva Caceres**,” as well as the earlier submission of its building permit application (four months ahead of those for the two old Spanish buildings), speaks for itself in terms of showing the much higher value, importance and priority that Nagaland gives it over the real heritage buildings. The **whole lot complex as planned would be cemented**, including for parking spaces in front of the commercial building.

**[17.2]** But after all that heritage complex plan conceptualization and discussion, the Nagaland Plan towards the end surprisingly and strangely makes a Recommendation no. 2: “If possible, that the owner is willing to donate the two (2) buildings to the LGU for possible relocation for tourism-potential development initiated by the city.” (p. 63) Nagaland’s slip is showing, as it were, that its real interest is in the commercial property development of the whole lot, not in the heritage conservation of the two Spanish building ruins.

**[18]** In the meantime, on May 2, 2025, another mall, the Downtown District, styled as “the only luxury lifestyle hotel at the heart of Naga City,” opened for business along Elias Angeles St. This is the latest of four commercial buildings in the vicinity of the “Nagaland Heritage Property” where the Naga Ruins are located, and several of which were formerly the sites of old establishments that were already of a heritage nature. Emall was formerly the old ALATCO bus terminal, Nagaland Hotel was formerly the old GSIS building, and Downtown District was formerly the old Peña de Francia School, which before that was the old-style residential house of renowned Bikol historian Domingo Abella.

**[19]** Forgive the Beatles digression at this point but the lyrics are so apt:

**There are places I'll remember  
All my life, though some have changed  
Some forever, not for better  
Some have gone and some remain<sup>5</sup>**

Those abovesaid places, “some have gone and some remain,” are all located in what is supposed to be “Naga City’s Soul: The *Ciudad de Nueva Caceres* Heritage District.”<sup>6</sup> Sadly, much heritage property here has been, and continues to be, swallowed by private commercial property interests with much money. This continuing commercialization and “*mallification*” of heritage property here is certainly “**capable of repetition yet evading review.**” One need only walk from the Naga Metropolitan Cathedral down Barlin St. and then down Gen. Luna St. up to Tabuco Bridge in Naga’s *centro*

<sup>5</sup> The Beatles, “In my Life,” *Rubber Soul* (1965).

<sup>6</sup> See Wilfredo B. Prilles, Jr. “Safeguarding Naga City’s Soul: The Ciudad de Nueva Caceres Heritage District,” *AMISTAD 2.0* (Nueva Caceres Heritage Movement, Inc.), 30 June 2025, pp. 18-19.

to see “some have gone and some remain” (but may soon be gone, before we know it) heritage properties. Is this the price we must pay for so-called progress and development? Are we willing to pay this price? Or is it the kind of “offer that can’t be refused”?

**[20]** Before the **SP of Naga City and its Committee on Culture and the Arts** started to hold hearings on the **Nagaland Plan** on July 28, 2025, several local heritage advocacy groups submitted position papers thereon. Among these was that of the **Naga City Arts and Culture Coalition (NCACC) and Saysay Bikol (historical group) position paper dated 25 July 2025** which, among others, expressed a word of appreciation to the Enrile family for shifting their position from demolition to avowed heritage conservation of the Naga Ruins.

**[20.1]** The said position paper then made some initial constructive critical observations on the Nagaland Plan, esp. that the blocked street view would gravely undermine the two ruined heritage structures, with the focus improperly shifting to the upfront “Paseo de Nueva Caceres” commercial strip. [A copy of this NCACC-Saysay Bikol position paper may be provided, if still needed by the Court.] In other words, **this strong heritage-oriented objection to the Nagaland’s planned new commercial building blocking the frontal and main street view of the Naga Ruins was put on record early on in July 2025 with the CGN and even Nagaland**, as well as the NHCP.

**[20.2]** This would be reiterated several times on appropriate occasions throughout the rest of 2025. The said NCACC-Saysay Bikol position paper finally called for tripartite (Nagaland-CGN-heritage advocates coalition) collaboration in the best interest of Naga City’s historical and cultural heritage.

**[20.3]** In any case, the **SP of Naga City**, soon after the July 28 committee hearing, passed **Resolution No. 2025-322** later on the same date, strongly and urgently requesting the NHCP Board “to allow local consultations on the Spanish-era ruin structures in Naga City to proceed and be consummated before lifting the Cease-and-Desist Order (CDO) it previously issued on proposed development in the area.” [This SP Resolution is appended as *Annex/Exh. H.*]

**[21]** The said SP Resolution was emailed by the SP Secretariat to the NHCP on July 29, 2025 at 3:00PM, but unfortunately it was for some reason not endorsed in time for the **NHCP Board Regular Meeting on July 30, 2025** wherein the lifting of the CDO on Nagaland was on the agenda and decided affirmatively. Only two weeks later, on August 12 and 14, 2025, did the NHCP issue letters to Nagaland and to Mayor Robredo of Naga City, informing them that **the CDO on Nagaland had been lifted** “following their compliance with the NHCP requirements.” [These two NHCP letters are appended as *Annexes/Exhs. I & I-1.*]

**[21.1]** The **first NHCP letter** to Nagaland, after requiring Nagaland “to submit a structural assessment and conservation methodology, which will form part of its building permit application” with the CGN, and directing the City Building Official “to closely monitor the implementation of the project,” finally stated that **“With this condition in place, you may now proceed with the development plans concerning the structures.”**

**[21.2]** Note that in referring to “the structures,” **the context is clearly the old Spanish colonial structures** because of the required “structural assessment and conservation methodology” that applies to them, **not to the proposed new commercial building**. But it appears that the two NHCP letters on the CDO lifting has been taken by Nagaland, if not also by the CGN, as the NHCP allowing Nagaland to proceed with its commercial building, or at least having no objection thereto.

**[21.3]** The **second NHCP letter** addressed to Mayor Robredo stated in particular: **“As regards the proposed new commercial building** in the front of the old structures... the property owner provided more than the required minimum buffer zone of five (5) meters, thereby ensuring the protection of the presumed ICPs. While current laws do not include provisions for the protection of sightlines affecting cultural properties undertaken by private developers, the NHCP has found that the submitted conceptual design of the commercial building harmonized with the architectural design of the Spanish Colonial structures.”

**[21.4]** The therein reference to “the old structures” as “presumed ICPs” would indicate that this presumption has not been removed by the NHCP. But NHCP’s statement that “current laws do not include provisions for the protection of sightlines affecting cultural properties undertaken by private developers” is **misleading, if not erroneous**, as the later legal discussion below will show.

**[21.5]** Nagaland’s representatives **mislead and misrepresent** these two NHCP letters as “the last word” or final *imprimatur* on the design of the Nagaland Paseo de Nueva Caceres Heritage Complex with its Paseo de Nueva Caceres commercial strip along the whole lot frontage. But both letters in fact show that this would still need to go through “building permit application to the City Government of Naga.”

**[22]** In 2025, the **Naga City SP Committee on Culture and the Arts** held **several committee hearings** (e.g. July 28, September 4, and October 10) and one Public Presentation (November 21) on the Nagaland Plan. At the **September 4, 2025 public hearing** in particular, **Nagaland representatives were on record as stating the following remarks** (not all in exact quotations), among others:

-- Nagaland previously intended to demolish the Naga Ruins of two Spanish buildings.

-- Nagaland implores “balancing of interests” in the disposition of the Naga Ruins Heritage Site conservation and development issue.

-- But Nagaland is averse to a tripartite (Nagaland-CGN-Heritage Advocates Coalition) collaborative and consultation process for the Naga Ruins Heritage Site conservation and development.

-- Nagaland invokes its private property rights of “untrammelled” prerogative as owner on what do to with its own property.

-- “Beauty is in the eye of the beholder.” Nagaland also asserts this with regards to its plan for a *Paseo de Nueva Caceres* Heritage Complex on its whole lot including adaptive reuse conservation of the two old building ruins and construction of a new commercial building with a Spanish colonial architectural design along the whole lot frontage, effectively covering the frontal or main street view of the Naga Ruins themselves,

-- Nagaland is very willing to sell the whole Naga Ruins Heritage Site lot at “fair market value” or for “just compensation.”

-- Nagaland admitted to using at least the old Spanish barracks (*Cuartel*) as a makeshift barracks for its construction workers at least during perimeter fencing it undertook.

[A copy of the SP Committee on Culture and the Arts Report of September 4, 2025 may be provided, if still needed by the Court.]

**[23]** After the September 4 public hearing and before the October 10 executive session of the SP Committee on Culture and the Arts, the **Naga City Historical and Cultural Heritage Advocates Coalition** submitted a **unified position paper dated 9 September 2025** on a proposed tripartite consultation process on the Naga Ruins Heritage Site conservation and development plans of Nagaland.

**[23.1]** It presented and explained this proposal, including its legal, moral, and policy aspects, and highlighting the Empowerment Ordinance of Naga City during the term of the late great former Mayor Jesse M. Robredo that exemplarily institutionalized people’s empowerment in the city.

**[23.2]** Finally, it proposed the exploration of lot acquisition, including swapping, options between the CGN and Nagaland. [A copy of this Naga City Historical and Cultural Heritage Advocates Coalition position paper may be provided, if still needed by the Court.]

**[23.3]** Incidentally, this proposed Tripartite Consultation Process and Lot Acquisition Exploration were both strongly endorsed through formal recommendations by the **City Planning and**

**Development Office (CPDO) in its Evaluation Report dated 9 September 2025.** [A copy of this CPDO Evaluation Report is appended as *Annex/ Exh. J*]

**[24]** But come the **October 10, 2025 executive session of the SP Committee on Culture and the Arts**, it made a **disposition**, the most crucial part of which was:

“ i. Direct the City Engineer’s Office, particularly its Building Officials/Section, to consider processing of the Building Permit/ Development Permit/ Construction Permit being applied, or to be applied, by the Nagaland Corporation on its property located at Barangay San Francisco, this city, SUBJECT to the conditions, as follows:

“a. The submission of all the standard requirements under the National Building Code;

“b. Prior issuance of such permit, the Nagaland Corporation shall be required to do public presentation on the Conservation Management Plan it submitted to the NHCP prior to the lifting of the CDO – how the plan will be implemented and the schedule of implementation; and to invite the Coalition member organizations to attend such Public Presentation;

“c. The submission of plans, for the improvement of the two ruins of heritage structures, that were so required by the National Historical Commission of the Philippines when the latter lifted the CDO.”  
(*underscoring supplied*)

[A copy of the SP Committee on Culture and the Arts Report of October 10, 2025 may be provided, if still needed by the Court.] “But since there was no quorum, the Chairman (Councilor David Casper Nathan A. Sergio) moved that the discussion of the matters will be reported to the SP plenary as the Committee of the Whole.” This was done on October 14, 2025 and the reported Committee Disposition was apparently adopted by the SP plenary but unfortunately plaintiff Santos has not been able to secure its report, despite repeated requests with the SP Secretariat. In any case, **instead of the proposed tripartite consultation process, or a genuine public consultation, what emerged was a mere “Public Presentation.”**

**[25]** On **November 21, 2025**, the abovesaid required **“Public Presentation on the Conservation Management Plan for the Old Spanish Era Cuartel and Almacen”** was conducted at the nearby Barangay San Francisco Covered Court on invitation of the Office of the City Engineer (CEO). But the November 11 invitation letter itself starts by stating that “This is relative to the building permit application of Nagaland Development Corporation (NDC) for a two-storey commercial building to be constructed along Peñafrancia Avenue... on the lot where the Old Spanish Era Cuartel and Almacen structures are located.” [A copy of this CEO letter invitation is appended as *Annex/ Exh. K*]

**[25.1]** The presentation itself made by Nagaland’s commissioned conservation architect Joel V. Rico focused only on the conservation by adaptive reuse plan for the two old Spanish buildings, not covering the two-storey commercial building along Peñafrancia Avenue blocking the frontal and main street view of those Naga Ruins – the most objectionable feature of the Nagaland Plan.

**[25.2]** Nagaland again asserted their private property rights of “untrammelled” prerogative as owner of the rest of the land in its lot beyond the minimum 5-meter buffer zone around the two old Spanish buildings, where both the NHCP and the CGN still had a certain extent of heritage protection control. Unfortunately, the heritage advocates coalition has not been able to secure any official report or documentation of the November 21, 2025 Public Presentation, despite repeated requests, and it turns out that “no one took minutes of the proceedings. It was overlooked inadvertently. A report on the event, however, was submitted to the Office of the City Mayor.”

**[26]** Nagaland has however somehow been able to get both the NHCP and the CGN to treat the whole lot in two separate portions: [1] the portion immediately around (with minimum 5-meter buffer zone for) the Naga Ruins; and [2] the rest of the lot, including the whole frontage along Peñafrancia Ave. Thus, the separately-timed applications for building permit despite the submitted whole-lot conservation and development plan for a “Paseo de Nueva Caceres Heritage Complex.” This is CONTRARY to the afore-mentioned NHCP recognition of the Naga City SP Resolution that “declared[d] the old ruins at Barangay San Francisco as heritage structures and the parcel of land wherein these structures are erected as heritage site.” In fine, the two heritage structures should not be treated separately or disaggregated from their heritage site.

**[27]** Within the same day, November 21, 2025, the Acting Building Official Elmer T. Albo issued **Building Permit No. 0970-2511-0835** for the Nagaland 2-storey commercial building along Peñafrancia Ave. [A copy of this CEO letter invitation is appended as Annex/ Exh. L] It was as if the Public Presentation was just going through the motions to meet the building permit requirement, though this was just one of the SP Committee October 10, 2025 executive session conditions for it (presumably ratified by the SP October 14, 2025 plenary). No more (waiting for) any official report or documentation. Whatever was aired did not really matter, just the holding itself of the Public Presentation. Then *voila*, building permit on the same day. Sounds like an episode of “Stranger Things” in City Hall. And soon enough after the building permit was issued, Nagaland started its **ground construction preparation** along its whole lot frontage which continues to this day.

**[28]** But not knowing yet that a building permit was issued only for Nagaland’s proposed new commercial building, the **plaintiffs on December**

**12, 2025** wrote a letter to Mayor Robredo and Acting City Engineer/Building Official Albo strongly opposing the Nagaland building permit application for its whole Paseo de Nueva Caceres Heritage Complex (including the proposed new commercial building) affecting the Naga Ruins. Here is where the plaintiffs initially submitted its specific objections “**to the following two aspects** of the Nagaland plan as submitted and presented:

“1. the planned Nagaland two-story commercial building to be called *Paseo de Nueva Caceres* along the whole lot frontage along Peñafrancia Ave. **will prejudice the heritage value and importance due the two Spanish building ruins ICPs** by blocking the street view which is the main sightline to them, despite the availability of less intrusive space at the right side frontage of the lot; and

“2. the planned whole *Paseo de Nueva Caceres Heritage Complex* lot of 4,991 square meters would be all surface-cemented, with no open green spaces for grass and trees, and **would most likely aggravate Naga City flooding in that area** near the Naga River to its rear; xxx”

that we submit are **CONTRARY TO LAW AND PUBLIC POLICY**, at least in spirit if not also in letter, at both the national and local levels. Among these national and local laws and public policies, that are deemed written into whatever existing guidelines on local building permit applications and grants...” followed by citations of Constitutional Provisions, National Laws, and Local Ordinances, Resolutions & Executive Issuances. [A copy of this plaintiffs’ first letter is appended as *Annex/Exh. M*]

**[29]** After learning definitively only on December 19 of the November 21 building permit, the **plaintiffs wrote again Mayor Robredo on December 23, 2025** with an urgent request regarding the Nagaland commercial building permit and ongoing ground preparation fronting the Naga Ruins ICPs. Here the plaintiffs requested the soonest intervention of the local chief executive “**by way of the following decisive and prompt measures** in the best interest of the city, of its invaluable Naga Ruins ICPs of its historical and cultural heritage, and even of the private developer Nagaland:

“[a] At least **temporarily suspend the building permit** (and therefore the ongoing construction ground preparation) in the meantime **to give way to the soonest expeditious sorting out of the abovesaid relevant issues**, while avoiding what may be unnecessary construction expenses but also irreversible actual building construction **when there may actually be other options or better alternatives**. Among these is:

“[b] As already stated and elaborated in our said immediately preceding letter of 12 December 2025, **explore a mutually acceptable lot swapping arrangement with Nagaland** – an option already formally endorsed by the City Planning and Development Office (CPDO). This **entails lining up lots to swap**.

“[c] Short of a lot swap, **explore the next best alternative for the Nagaland commercial building to be positioned elsewhere in the big 4,991 square meters lot in a way that it does not block the street view of the Naga**

**Ruins.** There is sufficient space for a commercial building, even three- or four-storey, **at the front right side of the lot adjacent to the existing three-storey with roofdeck ACLC building** which is just to the right of that front right side...”

The letter continued to state: “.... We really hope that it does not have to come to adversarial litigation... **Thus, this last-ditch effort, *suntok sa buwan* though it may be, to implore your enlightened and progressive mayoral intervention through the above-suggested decisive and prompt measures** while still relatively early in the Nagaland commercial building ground construction preparation after the issued November 21 building permit by the city government.... We are prepared to participate in any relevant talks that you may arrange with Nagaland, as you deem fit, more realistically for us after the holidays, and only ask for reasonable advance notice....” [A copy of this plaintiffs’ second letter is appended as *Annex/ Exh. N*]

**[30] Not hearing at all from City Hall one month after** the plaintiffs’ second letter, while in the meantime Nagaland ground preparation has been ongoing for nearly two months after the CGN issued the building permit [a set of **photographs taken on January 15, 2026** showing this ongoing ground construction preparation is appended as *Annex/ Exh. O*], plaintiffs see **no other plain, speedy and adequate remedy** in the ordinary course of law than this court action, which could include court mediation or judicial dispute resolution. Stated otherwise, first resort to *santong dasalan* at the Nagaland, CGN and even NHCP administrative levels (in other words, **exhaustion of administrative remedies**) having failed, we are now compelled to *santong paspasan* to litigate as a last resort judicial remedy and relief. Thus, this Complaint.

### *Existing Legal and Policy Terms of Reference*

**[31]** As an **Introductory Note**, plaintiffs proceed now to the existing legal and policy terms of reference as largely undergirding, before fully arguing, our contention that the building permit and construction of the Nagaland new commercial building on its private lot but blocking the frontal or main street view of the Naga Ruins LGU-declared Important Cultural Properties are **CONTRARY TO LAW, PUBLIC POLICY, JUSTICE AND EQUITY**, and must be enjoined.

### Constitutional Provisions:

**Preamble:** “ ... promote the common good, conserve and develop our patrimony...”

**Article II (State Policies), Section 16.** “The State shall protect and advance the right of the people to a balanced and healthful ecology in accord with the rhythm and harmony of nature.”

**Article XII (National Economy and Patrimony), Section 6,** “The use of property bears a social function, and all economic agents shall contribute to the

common good. Individuals and private groups, including corporations, cooperatives, and similar collective organizations, shall have the right to own, establish and operate economic enterprises, subject to the duty of the State to promote distributive justice and to intervene when the common good so demands.”

**Article XIV (on Arts and Culture), Section 15.** “Arts and letters shall enjoy the patronage of the State. The State shall conserve, promote, and popularize the nation's historical and cultural heritage and resources, as well as artistic creations.”

**Section 16.** All the country's artistic and historic wealth constitutes the cultural treasure of the nation and shall be under the protection of the State which may regulate its disposition.

**[32] The protection, conservation and restoration of the two Naga Ruins is for the common good of the people of Naga City, if not of the whole Philippines, in terms of the social function that is historical and cultural heritage.**

**[32.1]** The constitutional provision on “the social function of the use of property for the common good” is complemented by the social teachings of the Catholic Church, among other religions, on “**the social character of private property**” as espoused in the Papal encyclicals *Rerum Novarum* (Pope Leo XIII, 1891) and *Quadragesimo Anno* (Pope Pius VI, 1931).

**[32.2]** Important cultural properties (ICPs) may also be likened to the “**national patrimony**” that “We, the sovereign Filipino people,” per our **Constitution’s Preamble**, undertake to “**conserve and develop our patrimony.**” National patrimony refers to the wealth and heritage of a nation, encompassing both tangible and intangible assets. It includes natural resources, cultural heritage, and historical artifacts, all of which are considered vital to a country's identity and well-being. The concept is often enshrined in constitutional provisions to ensure the protection and sustainable management of these assets for present and future generations.

#### National Laws:

**[33] National Cultural Heritage Act of 2009, RA 10066**, as amended by 11961, Section 7, **Important Cultural Property (ICPs) shall be entitled to certain privileges** such as “(a) Priority government funding for protection, conservation and restoration; (b) Incentive for private support of conservation and restoration...; (c) An official heritage marker...; (d) Priority government protection... in times of armed conflict, natural disasters, and other exceptional events that endanger the cultural heritage of the country; and (e) **Priority protection from modification or demolition resulting from all government projects...** Government projects that may potentially affect the integrity of any Grade I or Grade II Level cultural property must consult with the Commission [the NHCP] at the planning stages.”

**[33.1]** If priority protection from modification or demolition of ICPs by even government projects is provided for, then with more reason for that protection from private projects.

**[33.2]** Under **Sec. 10(b) of the 2014 Implementing Rules and Regulations of RA 10066 (IRR)**, “**Presumed Important Cultural Properties** shall have the **same level of protection as Grade II Level cultural properties...**” The Naga Ruins are presumed ICPs per the NHCP but they are also LGU-declared ICPs per the CGN.

**[33.3]** Under **Sec. 4 of RA 11961 and especially Sec. 10 of its IRR**, the Naga Ruins would also come under **Grade III Level: “All other cultural property... including those declared by local government units (LGUs).”** Under **Sec. 18 of the IRR**, it is provided:

“**Section 18. Local Government Unit (LGU) Declarations.** -  
- Republic Act No. 7160, otherwise known as the Local Government Code of 1991, particularly Section 16 thereof, mandates that local government units ensure and support the preservation and enrichment of culture and to preserve the comfort and convenience of its inhabitants. LGUs may declare and protect cultural properties of local significance by enacting the appropriate local ordinances subject to the guidelines on LGU declarations to be issued by the Commission, which shall form part of these Rules as Annex 5.

xxx xxx

“**Section 18.2. City Cultural Properties and Heritage Zones.**  
– City LGUs may declare and protect City Cultural Properties or Heritage Zones by enacting the appropriate city ordinance. Section 458(a) 2(vi) of Republic Act No. 7160 empowers the Sangguniang Panlungsod to prescribe reasonable limits and restraints on the use of property within the jurisdiction of the city. Such local ordinances shall include the grant of privileges for locally-declared cultural properties or incentives for conservation efforts to the extent that the mandate of LGUs allow.”

*Local Ordinances, Resolutions & Executive Issuances:*

**[34]** The Naga Ruins Heritage Site is **not simply and purely private property**, as indicated by the term “Nagaland Heritage Property.” The two Spanish building ruins therein have been declared **Important Cultural Properties (ICPs)**, notably by **Naga City Sangguniang Panlungsod Resolution No. 2024-264** – which makes express reference (in its page 2) to being “based on legal grounds, such as RA 7160 or the Local Government Code of the Philippines; RA 10066 or the National Cultural Heritage Act of 2009; Naga City Ordinance No. 2003-003; Naga City Resolution No. 2014-038; and DILG Circular No. 2017-133, among others.”

**[34.1]** Incidentally, SP Resolution No. 2024-264 also made reference to, and thereby ratified or validated, an earlier **SP Resolution No. 2014-038** of more than 10 years ago, which had

already “declare[d] the old ruins at Barangay San Francisco as heritage structures **and the parcel of land wherein these structures are erected as heritage site.**” To be very clear, not just “the old ruins” as “heritage structures” but also “the parcel of land” containing them “as heritage site”

**[34.2]** They also happen to be **in the heart of “Naga City’s Soul: the Ciudad de Nueva Caceres Heritage District”** through its updated Comprehensive Land Use Plan (CLUP) and new Zoning Ordinance.

**[35]** In terms of current LGU policy, no less than the new Naga City Mayor Maria Leonor G. Robredo in her **Inaugural Speech** on 30 June 2025 provided this relevant policy guidance on heritage, culture and the arts, and environment: (underscorings supplied)

-- “We will preserve our history, language and cultural heritage alongside our efforts to make Naga a more conducive and welcoming space for creative workers and artists.”

-- “In our pivot towards stronger environmental stewardship, we strive to create open spaces, with thriving trees and gardens becoming part of our collective lives.”

AND in her **Executive Order No. 003** of the same inauguration date 30 June 2025, “SECTION 1. INSTITUTIONALIZATION OF THE 2028 FINISH LINES,” provides for these as “the official strategic development framework of the City Government,” consisting of eight “thematic outcome areas,” the second and fifth of which are:

“B. A Cleaner, Greener, and Flood-Resilient City

“E. Conserving and Building Naga’s History, Arts, Culture, and Heritage for Future Generations.”

### The Torre de Manila Jurisprudence

**[36]** It is inevitable to refer to the Supreme Court (SC) Decision in ***Knights of Rizal vs. DMCI Homes Inc., et al.***,<sup>7</sup> allowing the construction of the Torre de Manila despite its marring the sightline at the rear of no less than our national paramount Rizal Monument because “there is no law prohibiting the construction of the Torre de Manila due to its effect on the background ‘view, vista, sightline, or setting’ of the Rizal Monument.” Not only because this involves sightlines of important cultural properties but also because Nagaland’s lawyers have already invoked this jurisprudence during one Naga City SP Committee on Culture and the Arts hearing.

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<sup>7</sup> 809 Phil. 453 (2017).

[37] Before commenting further, it is to be noted that the said ruling was made with a **close 9-6 vote** over the **strong Dissenting Opinion** of Justice Francis H. Jardeleza. In any case, the factual situation in that case is **very different from the factual situation of the Nagaland Plan for the two Naga Ruins and lot**. The Torre de Manila case involved only the rear “sightline” of the Rizal Monument, it did not involve physically touching that Monument, just its background view -- like a “photo bomber” but which was of some considerable distance in the background.

[37.1] The Nagaland Plan, on the other hand, involves physically touching the two Naga Ruins to the point of changing their appearance albeit by the recognized conservation mode of adaptive reuse. It involves much more than just “sightlines” (and for that matter 5-meter buffer zones) to the Naga Ruins. It involves a most crucial Conservation Management Plan for the Ruins, something that should not be left to chance. It involves the development of a commercial building of frontage length, blocking the frontal or main street view of the Naga Ruins, in a heritage site at the heart of the City’s Heritage District.

[37.2] Aside from obstructing the all-important front “sightline” to the Naga Ruins, there would be the over-cementing for buildings, parking, pathways and other structures in the Nagaland Plan, the proneness of over-cementing to flooding near the Naga River, not to mention greater heat indexes during the hot summer months.

[38] Though the slim majority Decision allowed the construction of the Torre de Manila despite its marring the rear sightline of the Rizal Monument, it contained this factual note:

“Subsequently, both the City of Manila and DMCI-PDI sought the opinion of the National Historical Commission of the Philippines (NHCP) on the matter. In the letterdated 6 November 2012 from NHCP Chairperson Dr. Maria Serena I. Diokno addressed to DMCI-PDI and the letter<sup>1</sup> dated 7 November 2012 from NHCP Executive Director III Ludovico D. Badoy addressed to then Manila Mayor Alfredo S. Lim, the NHCP maintained that the Torre de Manila project site is outside the boundaries of the Rizal Park and well to the rear of the Rizal Monument, and thus, cannot possibly obstruct the frontal view of the National Monument” (*footnotes omitted; underscoringsupplied*).

**This implies that the NHCP had considered as objectionable the obstruction of the frontal view of this important cultural property.**

[39] Still, the Decision, in the course of its narrow ruling that “there is no law prohibiting the construction of the Torre de Manila due to its effect on the background ‘view, vista, sightline, or setting’ of the Rizal Monument,” reminded us of certain relevant general parameters:

“In *Manila Electric Company v. Public Service Commission*, the Court held that “**what is not expressly or impliedly prohibited by law may be done, except when the act is contrary to morals, customs and public order.**” This principle is

fundamental in a democratic society, to protect the weak against the strong, the minority against the majority, and the individual citizen against the government. In essence, this principle, which is the foundation of a civilized society under the rule of law, prescribes that the freedom to act can be curtailed only through law. Without this principle, the rights, freedoms, and civil liberties of citizens can be arbitrarily and whimsically trampled upon by the shifting passions of those who can shout the loudest, or those who can gather the biggest crowd or the most number of Internet trolls. In other instances, the Court has allowed or upheld actions that were not expressly prohibited by statutes when it determined that these acts were not contrary to morals, customs, and public order, or that upholding the same would lead to a more equitable solution to the controversy. However, it is the law itself - Articles 1306 and 1409(1) of the Civil Code - which prescribes that acts not contrary to morals, good customs, public order, or public policy are allowed if also not contrary to law" (footnotes omitted; underscoring supplied).

[40] Speaking of the SC, a relevant digression is to its own **Hymn** with its refrain "**justice and equity for all.**" Justice and equity are not only fundamental legal concepts but also constitutional values, ideals, and aspirations reflected in the penultimate phrase of the Preamble of the 1987 Constitution: "a regime of truth, justice, freedom, love, equality, and peace." The broad concepts of justice and equity undergird specific aspects or fields thereof such as heritage justice, environmental justice, property equity, and development equity, that are applicable to the case at bar. Thus, the validity parameters are not only "law, morals, good customs, public order, or public policy" but also "justice and equity." And thus plaintiffs' invocation of "CONTRARY TO LAW, PUBLIC POLICY, JUSTICE AND EQUITY."

[41] But beyond the thin majority Decision, there is the strong Dissenting Opinion of Justice Jardeleza from which to draw what to us may be **better wisdom, often found when "dissenting to conventional thought."** For one, there is this parting view of the Jardeleza dissent:

"To end, I am reminded of the view, first expressed in *Tañada v. Angara*, that even non-self-executing provisions of the Constitution may be "used by the judiciary as aids or as guides in the exercise of its power of judicial review." More than anything, this case presented an opportunity for the Court to recognize that aspirational provisions contained in Article II (Declaration of Principles and State Policies) and many more similar provisions spread in the Constitution, such as Sections 14 and 15, Article XIV, are **not**, in the words of Chief Justice Reynato Puno, "meaningless constitutional patter." These provisions have constitutional worth. They define our values and embody our ideals and aspirations as a people. The command under Section 15, Article XIV of the Constitution for the State to conserve the nation's historical and cultural heritage is as much addressed to this Court, as it is to Congress and to the Executive. We should heed this command by ordering a remand, more so where there is an obvious intent on the part of the City of Manila, in the exercise of its delegated police power from Congress, to incorporate heritage conservation, aesthetics, and environment protection of views into its zoning ordinance.

"In this modern world, heritage conservation has to constantly compete with other equally important values such as property and property development. In litigations involving such clash of values, this Court sets the tone on the judicial solicitude it is duty-bound to display towards aspirational constitutional values,

especially when implemented by specific and operable legislation. Here, we had the unique opportunity to give the value of heritage conservation, involving as it does the preservation of fragile and vulnerable resources, all the breathing space<sup>l</sup> to make its case. This Decision, however, seems to have achieved the complete<sup>l</sup> opposite” (*footnotes omitted; underscoring supplied*).

[42] The Jardeleza dissent found specific heritage conservation, aesthetic, and environmental protection standards in the City of Manila Ordinance No. 8119 Comprehensive Land Use Plan and Zoning Regulations of 2006 that would militate against the Torre de Manila’s marring of the rear sightline of the Rizal Monument, but which those most concerned, even the City of Manila and the SC majority, unfortunately did not make recourse to.

[42.1] Under Article 8 of the Civil Code, “Judicial decisions applying or interpreting the laws or the Constitution shall form part of the legal system of the Philippines.” **In the case of SC Decisions, we dare say that that the dissenting opinions are still part thereof, and therefore also “shall form part of the legal system of the Philippines.”**

[42.2] Which is why these dissenting opinions are published as such in official court reports, along with their respective majority or main decisions, and continue to be validly cited not only in adversarial legal argumentations but also in the later SC decisions themselves, especially ones adopting those dissenting opinions as new majority views.

[43] Unfortunately also, Naga City admittedly does not yet have such a Comprehensive Land Use Plan and Zoning Ordinance. Be that as it may, plaintiffs respectfully submit that there is sufficient factual, legal and policy basis, including in other relevant jurisprudence, for finding that the building permit and construction of the Nagaland new commercial building blocking the frontal or main street view of the Naga Ruins LGU-declared Important Cultural Properties are **CONTRARY TO LAW, PUBLIC POLICY, JUSTICE AND EQUITY**, and must be enjoined.

#### Arguments for Injunction

[44] As stated or indicated earlier above, the high heritage importance and value of the Naga Ruins, especially as Naga City is concerned, is well-established (admitted by Nagaland itself) and should no longer be an issue in this case. If justice is understood most basically to be “**giving everyone his due**,”<sup>8</sup> then **heritage justice can be understood as giving important cultural property their due in terms of protection, regulation of disposition, conservation, promotion and popularization**, as in fact mandated by the 1987 Constitution in Art. XIV, Secs. 15 & 16. These

<sup>8</sup> From the Civil Code, Art. 19: “Every person must, in the exercise of his rights and in the performance of his duties, act with justice, give everyone his due, and observe honesty and good faith.” This is the lead article in the Civil Code Chapter 2 on Human Relations, and called “the doctrine of abuse of right.”

constitutional provisions, even though deemed non-self-executing, are nevertheless **aids or guides in the exercise of judicial power** -- as also are their corresponding implementing legislation and other issuances like the national laws and local (Naga City) ordinances, resolutions and executive issuances, outlined above in the section on “Existing Legal and Policy Terms of References.”

[45] But MOST IMPORTANTLY, there is AN EXISTING NATIONAL GUIDELINE, the **NHCP *Guidelines, Policies and Standards for the Conservation and Development of Historic Centers/ Heritage Zones*** (See this LINK: [Resolution 1984 May 29](#)), a later or more recent issuance more than six years after the Torre de Manila SC Decision and Jardeleza dissent, that is practically **spot-on the matter of obstructing or blocking the frontal or streetside view of heritage structures**. These Guidelines consider as no less than “**Offenses Against Historic/ Heritage Sites and Structures**” the following acts, among others:

“2. Visual distraction or obstruction...

“5. ... competition (a structure that competes with or subordinates a historic/ heritage structure)...

“12. Over-commercialism...

“13. Heavy construction...

It also lists as “**Potential Threats from Private Construction Activities**” the following, among others:

“6. Unauthorized visual distraction or obstruction

“7. Adjacent construction activities that may adversely affect historic sites/structures

“10. Obstruction of... open spaces...”

Rule II, Sec. 3 on “**Prohibited Structures**” refer to “Any structure or establishment that pollutes the environment, obstructs, or does not conform to the historical character and/or cultural value of the historic center/heritage zone shall not be allowed within the site.”

Rule III, Sec. 3 on “**Standards and Requirements of Architectural and Town/City Plans**” provides, among others, for:

“F. **Streetscape**. Street and road pavements shall be maintained in good condition for safety and appearance since they serve as visual corridors of the historic centers...

“R. **Visual corridors and vista points**. The LGU, with assistance from the NHCP, shall identify the locations of the vista points as strategic places for beautiful panorama and photo opportunities...”

[46] The abovesaid NHCP *Guidelines, Policies and Standards for the Conservation and Development of Historic Centers/ Heritage Zones* may be said to **partake of not only national policy but also of national law**. In administrative law authorities:

“Rules and regulations, and general orders enacted by administrative authorities *pursuant to the powers delegated to them* have the force and effect of law. They are binding on all persons subject to them and the courts will take judicial notice of them. Compliance with valid administrative rules and regulations is compliance with law”<sup>9</sup> (*italics in original; underscoring supplied*).

In other words, the Nagaland new commercial building construction blocking the front or main street view of the Naga Ruins, which had been LGU-declared as a heritage site, is **CONTRARY TO BOTH PUBLIC POLICY AND LAW. Even only on this point alone, that ought to be enjoined.**

[47] UNESCO highlights the need to consider views and visual integrity in heritage cities such as Vigan, where historic buildings and their impact on surrounding views are crucial to conservation. Buildings and their impact on important views and visual integrity is a point of strategic importance for conservation (*UNESCO, Vigan World Heritage documentation*). Urban conservation research often treats unobstructed street views of heritage facades as essential to authenticity, character, and public appreciation. Heritage assets foster place identity, support tourism, economic resilience, and cultural continuity. Visual integrity (including view corridors) is part of this framework (*Smith et al., 2025*). In fine, it is **a matter of not only physical integrity but also visual integrity of heritage buildings.**

[48] In fact, this should be COMMON SENSE which unfortunately is not too common in the field of law. The common sense is that the more important or valuable buildings, esp. for historical, cultural, and architectural heritage **promotion and popularization** (to use terms in the 1987 Constitution, Art. XIV, Sec. 15), are rendered readily visible to, rather than hidden or otherwise obstructed from the roadside view of, the people, be they passersby or visitors.

[49] The abovesaid NHCP Guidelines mention of “**Offenses Against Historic/ Heritage Sites and Structures**” is significant because it connotes that these structures **have some legal or juridical personality** as in offended parties of sort. And like natural and juridical persons, they can be “given their due,” they can be given justice, more particularly heritage justice by way of administrative, civil, and even criminal justice remedies.

[50] In so far as plaintiffs seek heritage justice for the Naga Ruins, that they be given what is due them as important cultural properties of Naga City, if not of the whole country, **plaintiffs boldly propose that such important historical and cultural heritage properties acquire a legal or juridical personality of their own.**

[50.1] Plaintiffs adopt by analogy the proposed legal standing in actions before courts of law for the “Resident Marine Mammals of

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<sup>9</sup> Neptali A. Gonzales, *Administrative Law: A Text* (Manila: Rex Book Store, 1979), p. 67, citing Am. Jur., pp. 433-434.

the Protected Seascape Tañon Strait” who were “Joined in and Represented herein by [two] Human Beings... in Their Capacity as Legal Guardians of the Lesser-Life Forms and as Responsible Stewards of God’s Creations” in the SC Decision in *Resident Marine Mammals v. Secretary Reyes, et al.*<sup>10</sup>

[50.2] It cites among others the 1972 U.S. case *Sierra Club v. Rogers C.B. Morton*,<sup>11</sup> wherein Justice William O. Douglas, dissenting to the conventional thought on legal standing, opined that

“... Inanimate objects are sometimes parties in litigation. A ship has a legal personality, a fiction found useful for maritime purposes. The corporation sole - a creature of ecclesiastical law - is an acceptable adversary and large fortunes ride on its cases. The ordinary corporation is a "person" for purposes of the adjudicatory processes, whether it represents proprietary, spiritual, aesthetic, or charitable causes.

“So it should be as respects valleys, alpine meadows, rivers, lakes, estuaries, beaches, ridges, groves of trees, swampland, or even air that feels the destructive pressures of modern technology and modern life. The river, for example, is the living symbol of all the life it sustains or nourishes-fish, aquatic insects, water ouzels, otter, fisher, deer, elk, bear, and all other animals, including man, who are dependent on it or who enjoy it for its sight, its sound, or its life. The river as plaintiff speaks for the ecological unit of life that is part of it. Those people who have a meaningful relation to that body of water - whether it be a fisherman, a canoeist, a zoologist, or a logger - must be able to speak for the values which the river represents and which are threatened with destruction” (*footnote and citations omitted; underscoring supplied*).

[50.3] As it is for the river, so it should be for important historical and cultural heritage properties. According to the UNESCO World Heritage Centre itself, “**Heritage** is our legacy from the past, what we live with today, and what we pass on to future generations.”<sup>12</sup> This is akin to “the concept of **intergenerational responsibility** insofar as the right to a balanced and healthful ecology is concerned” pronounced in *Oposa vs. Factoran*.<sup>13</sup>

[51] Relevantly and interestingly, the Nagaland Plan, to its credit, recounted that “... **constant floodings of the Naga River** forced the Spanish authorities to transfer some of its offices in places safer from annual flooding” (*p. 16*). Unfortunately, most Filipinos tend to have very short memories and poor historical sense. And so, “*Those who cannot remember the past are condemned to repeat it.*”<sup>14</sup> Naga and other formerly pristine cities like Baguio have been repeating it with rapid urban (so-called) development characterized by “**mallification**” and increasingly high-rise buildings with an over-cemented central cityscape encroaching on and disrespectful of the natural flow of rivers and other waterways, even cementing over them.

<sup>10</sup> G.R. Nos. 180771 and 181527, April 21, 2015.

<sup>11</sup> 405 U.S. 727, 92 S.Ct 1361, 31 L.Ed.2d 636.

<sup>12</sup> This was the opening quote of Justice Jardeleza’s Dissenting Opinion in the *Torre de Manila* case.

<sup>13</sup> 224 SCRA 792 (1993).

<sup>14</sup> George Santayana, *The Life of Reason* (1095-06).

[52] Relevant to this in the case of the Nagaland commercial building permit and construction is a **lacking Environmental Impact Assessment (EIA)** requirement mandated by RA 11961 and its IRR for building construction in a heritage site/ zone/ district. It is also **lacking Heritage Impact Assessment (HIA) and Archeological Impact Assessment (AIA)** requirements for the Nagaland commercial building permit and construction.

[53] In the instant case, we pair **heritage and environmental justice**, on one hand, **with property and development equity**, on the other. For one, looking at the subject property, **there are available alternative locations for the Nagaland new commercial building both outside (preferably) and inside its lot** where the Naga Ruins are located. Not only is there the possibility of a lot swap between the CGN and Nagaland, whereby the latter can construct its commercial building in another lot swapped by the CGN for the Naga Ruins lot if the CGN values it enough and Nagaland agrees to such a swap. But also Nagaland can construct its commercial building instead in another lot among its own vast landholdings in Naga City and environs.

[53.1] And, as should be only a last resort compromise, Nagaland can construct its commercial building still inside its lot where the Naga Ruins is located BUT in a location therein that does not intrusively obstruct their frontal and main street view. There is enough available space in the big 4,991 sqm. lot for this **alternative location in the front right side of the lot (adjacent to the existing ACLC building)** that in fact Nagaland had already once considered as indicated in a Site Development Plan in page 68 of the Nagaland Plan.

[53.2] Aside from that big 4,991 sqm. lot, **Nagaland already has a number of existing old and new commercial buildings just across that lot**, that have swallowed up other heritage properties in what is supposed to be “Naga City’s Soul: The *Ciudad de Nueva Caceres* Heritage District.” There is at least E-mall (formerly the old Alatco bus terminal), the Starmark Hotel and Café, the Nagaland Hotel (formerly the old GSIS building), and the Downtown District mall and hotel (formerly the old Peña de Francia School and residence of Bikolano historian Domingo Abella).

[54.] The **property equity** point here is to rephrase the famous **social justice** dictum that “those who have less in life must have more in law”<sup>15</sup> to conversely read “those who have more in life must have less in law.” Legally heretical though that may sound, the property imbalance **must be morally tilted** in the interest of heritage and environmental (anti-flooding) justice, as well as city sustainable and equitable development for the common good and public welfare, in the case at bar. **“It is “right and just.”**

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<sup>15</sup> See Joaquin G. Bernas, S.J., *The 1987 Philippine Constitution: A comprehensive Reviewer* (Manila: Rex Book Store, Inc., 2006), p. 16 commentary on the Article II, Sec. 10 state policy of social justice.

**[55]** More so that there appears to be **bad faith** on the part of defendant Nagaland. While the said Nagaland Plan was submitted to both the NHCP and the CGN, showing a whole *Paseo de Nueva Caceres Heritage Complex* for the whole lot it called the “Nagaland Heritage Property” where the two Naga Ruins are situated and where the proposed *Paseo de Nueva Caceres* commercial building is to be constructed, it has prioritized and is proceeding with the latter, even as its applications for building repair (adaptive reuse conservation) of the two Naga Ruins are still pending due to incomplete requirements.

**[55.1]** In other words, it has paid **lip service to heritage conservation in order to advance the construction of a new commercial building, even before the two Naga Ruins are secured for conservation** with the NHCP-required structural assessment, conservation methodology, and Archeological Impact Assessment (AIA). These may also have bearing on the nearby commercial building construction (and vice-versa) even with a required *minimum* buffer zone of 5 meters from the two Naga Ruins.

**[55.2]** For example, an AIA of the two Naga Ruins might indicate a need for a more than minimum 5 meters of buffer zone, which Nagaland appears to be violating based on its current G.I. sheets fencing very close (much less than 5 meters) to the Ruins. The **track record of Nagaland** has been the willful neglect and palpable physical deterioration of the Ruins while in its custody over a few years despite even a previous NHCP Cease and Desist Order, more so now that this has been lifted.

**[55.3]** But lately, even Nagaland’s lip service to heritage conservation has been dropped. As noted earlier above, during the November 21, 2025 Public Presentation of the Nagaland Conservation Management Plan for the Old Spanish Era Cuartel and Almacen, an Enrile family representative indicated that they are **withdrawing their commitment to conserve the two old Spanish buildings and will leave it to the CGN.**

**[56]** The new commercial building is obviously more important to Nagaland than the Ruins are, despite their avowed “heritage property” and their “heritage complex” plan. It is nothing less than **using the word “heritage” and the name “Nueva Caceres” in vain.** Unfortunately, the CGN seems to have taken the proverbial “path of least resistance” by not being sufficiently vigilant, responsive, and even transparent, in this whole matter, especially during the past year 2025. Apart from the fact that the building permit for the commercial building was issued with **unexplained haste** -- within the same day that the so-called Public Presentation was conducted -- the CGN appears to have gone overboard in accommodating Nagaland, choosing to ignore the two letters sent by the plaintiffs to the City Mayor, and not even acknowledging, much less, replying to them.

APPLICATION FOR A TEMPORARY RESTRAINING ORDER,  
AND WRIT OF PRELIMINARY PROHIBITORY AND  
MANDATORY INJUNCTION

**[57]** Now early in the New Year 2026, it has been two months after the CGN issued Nagaland a building permit for its new commercial building, and ground construction preparation therefor started in late November 2025. It has been a month since plaintiffs’ December 23, 2025 letter to Mayor Robredo with an urgent request to suspend the said building permit and undertake certain prompt and decisive measures to explore better alternatives to the ongoing ground construction fronting the Naga Ruins ICPs. Without hearing any word or of any action thereon, we are now compelled to seek judicial remedy and relief by way of this injunction Complaint.

**[58]** The suspension of the Nagaland new commercial building construction is in the best immediate interests of all concerned, especially the heritage conservation of the Naga Ruins, and also for Nagaland to avoid what could be unnecessary construction expenses, more so **should a permanent injunction be finally granted**, that may also order it to more expensively undo, including demolish, whatever construction obstructing the frontal view of the Naga Ruins, that would turn out to be wasteful.

**[58.1]** Whatever the final outcome of this case, **it is safer in the meantime** that the ongoing building construction is restrained or enjoined, to not only avoid unnecessary construction expenses on the part of Nagaland but also unnecessary even if unintended damage to the physical, structural and foundational integrity of the Naga Ruins – as there is still no NHCP-required Archeological Impact Assessment (AIA) of the Naga Ruins to secure their conservation, as for that matter there is still no honest-to-goodness specific and complete Conservation Management Plan (CMP) for them.

**[58.2]** And so, to be clear, **what is ultimately at stake here is not only the visual integrity but also the physical integrity** itself of the Naga Ruins LGU-declared ICPs on their LGU-declared heritage site.

**[59]** Against the traditional private property rights of defendant Nagaland, plaintiffs invoke the common good and public welfare embodied in the constitutional mandates to “conserve, promote, and popularize the nation’s historical and cultural heritage” and to “protect and advance the right of the people to a balanced and healthful ecology in accord with the rhythm and of nature,” as amply discussed above in the main body of this Complaint, including what may be considered as heritage rights of important cultural properties, such as against NHCP-designated “Offenses Against Historic/ Heritage Sites and Structures.”

**[59.1]** Ultimately, what is at stake here as endangered are **the heritage rights of the Naga Ruins and the heritage site, of the City and People of Naga, and of the plaintiffs themselves as Filipino citizens who have a real interest and stake in the nation's and the City's historical and cultural heritage that the Naga Ruins embody.** Likewise at stake here is **plaintiffs' RA 7356 "duty of every citizen to preserve and conserve the Filipino historical and cultural heritage and resources."** The plaintiffs are thus entitled to the injunction relief sought.

**[59.2]** The continuance of the ongoing ground preparation for defendant Nagaland's new commercial building fronting the Naga Ruins, and the non-suspension/ non-cancellation of defendant CGN's building permit which enables it, would work grave injustice, as in heritage injustice, to the plaintiffs and more so to the Naga Ruins, the City and People of Naga, and their heritage, if not also including, environmental rights. All these clear and unmistakable related rights, citizen duties, and constitutional mandates, as well as factual circumstances, were extensively discussed in the main body of this injunction Complaint.

**[60]** Given that the ground preparation for the construction of defendant Nagaland's new commercial building fronting the Naga Ruins has been **ongoing for about two months since late November 2025**, there is **great or irreparable injury** that would result to the Naga Ruins and its heritage site, for which the plaintiffs appear as Legal Guardians and Responsible Stewards, **before the matter can be heard on notice**, the issuance of an *ex parte* temporary restraining order (TRO) effective for 20 days from service to the defendants, under Section 5, Rule 58 on Preliminary Injunction, is called for of the court **as a matter of extreme urgency**. For this purpose, the court is urged to look at the **Annex / Exh. O photographs, if not also take a look at the "scene of the crime."** One will readily see there:

- a big back hoe that is used for ground diggings and excavations
- actual ground diggings and excavations, with several deep holes
- a number of preliminary small posts erected on the ground
- a cement mixer, and many bags of cement lined up near one building ruins
- G.I. sheets makeshift buffer but very close to the two building ruins
- a big shipping container used for storage of various construction materials
- various vehicles, esp. motorcycles, parked on the grounds.

These **facts on the ground are undeniable** even by defendant Nagaland.

**[61]** The TRO and preliminary injunction periods and hearings may, if not should, also provide **an opportunity for court mediation or judicial**

**dispute resolution** that better alternatively “would lead to a more equitable solution to the controversy” such as indicated in the plaintiffs’ December 23, 2025 letter to Mayor Robredo. Should such court mediation still fail for one reason or another, the plaintiffs are prepared to see this case through even to the bitter end, if only for the sake of other commercially-endangered heritage buildings in Naga City – the occurrence of visual and physical impairment of heritage buildings here being “**capable of repetition yet evading review.**”

[62] For purposes of the TRO and preliminary injunction, plaintiffs respectfully request this Court for **exemption from the posting of a bond**. With regards to whatever commercial property and business damages defendant Nagaland may sustain by reason of the TRO or injunction should the court decide that the plaintiffs are not entitled thereto, plaintiffs **counterpose, to more than offset the same**, the priceless value of the Naga Ruins as important local historical and cultural heritage properties that would be at least visually, if not also physically, prejudiced should the ongoing construction of the Nagaland new commercial building continue on its current location.

[62.1] It has already been pointed out above that it is safer in the meantime while this injunction Complaint is pending, that the ongoing building construction is restrained or enjoined, not only to avoid unnecessary construction expenses on the part of defendant Nagaland, but also to prevent further unintended damage that may be caused to the physical, structural and foundational integrity of the Naga Ruins, in case the court should decide that the plaintiffs are entitled to a permanent injunction.

[62.2] As plaintiffs had pointed out elsewhere in the above discussion, defendant Nagaland actually has other alternative locations for a new commercial building outside (preferably) and inside this heritage site. Besides, what are at stake here are constitutional mandates, and the plaintiffs do not make any claim for civil damages.

**WHEREFORE**, in view of all the foregoing, plaintiffs respectfully pray first of all for an **immediate *ex parte* Temporary Restraining Order (TRO)** effective for 20 days from service to the defendants, and **then a secondary post-hearing Writ of Preliminary Prohibitory and Mandatory Injunction**, with exemption from posting of a bond, for the Court to ORDER:

a. **Defendant Nagaland Development Corporation** to IMMEDIATELY STOP the ongoing ground construction preparation of its new 2-storey commercial building fronting and blocking the main street view (along the lot’s whole Peñafrancia Avenue frontage) of Naga City’s two Spanish-era civil building ruins that are LGU-declared Important Cultural Properties (ICPs);

b. **Defendant City Government of Naga (CGN)**, represented by its Mayor Maria Leonor G. Robredo, to likewise IMMEDIATELY SUSPEND, at least temporarily, its Building Permit No. 0970-2511-0835 issued on November 21, 2025 for the abovesaid Nagaland 2-storey commercial building.

Prayer for Permanent Injunction, and Other Just and Equitable Relief.

**WHEREFORE**, in view of all the foregoing, after the grant of a preliminary injunction, plaintiffs also pray, that Decision be rendered declaring permanent any issued preliminary prohibitory and mandatory injunctions, by:

b. PERMANENTLY ENJOINING defendant Nagaland Development Corporation from constructing a new 2-storey commercial building fronting and blocking the main street view (along the lot's whole Peñafrancia Avenue frontage) of the Naga Ruins ICPs; and for the said defendant to, as needed, demolish or otherwise undo whatever construction obstructing the frontal view of the Naga Ruins; and

c. Ordering defendant City Government of Naga to CANCEL its Building Permit No. 0970-2511-0835 issued on November 21, 2025 for the abovesaid Nagaland 2-storey commercial building.

Such OTHER RELIEF as may be deemed just and equitable be granted to the plaintiffs.

**Naga City, 23 January 2026.**

**PLAINTIFFS AND AS THEIR OWN COLLECTIVE COUNSELS:**

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***NOTICE OF APPEARANCE:*** In compliance with Rule 13-A of the Rules of Court, undersigned plaintiffs respectfully submit the email address [generalawabogados@gmail.com](mailto:generalawabogados@gmail.com) as their official email address where the electronic copies of all pleadings, orders, and court issuances may be sent.

**SOLIMAN M. SANTOS, JR.**

**LEO L. INTIA**

**LUIS RUBEN M. GENERAL**

**WINSTONEY MARIE SA. SALCEDA-MAZO**

**TABLE OF ANNEXES/ EXHIBITS**

In support of the factual allegations in the foregoing complaint, the following are the documentary evidence for the plaintiffs together with the judicial affidavits of plaintiffs Soliman M. Santos, Jr. and Winstoney Marie SA Salceda-Mazo:

**A** -- NHCP Letter to Atty. William T. Enrile (Nagalang) dated 16 November 2022

**B** -- NHCP Letter to Atty. William R. Enrile II (Nagalang) dated 10 January 2024

**C** -- Naga City Sangguniang Panlungsod (SP) Resolution No. 2014-038 declaring the two old ruins as heritage structures and their parcel of land as heritage site

**D** -- Naga City SP Resolution No. 2024-264 declaring the two Spanish-era stone buildings as Important Cultural Properties (ICPs)

**E** -- Nagaland New Commercial Building Permit Application on 24 Feb 2025

**F** -- Nagaland "Conservation Management Plan: Old Spanish Barracks and Storehouse, Naga City, Camarines Sur" (71 pages) prepared by Conservation Architect Joel Vivero Rico with his cover letter dated February 25, 2025

**G** -- Nagaland Building (Almacen) Repair Permit Application on Jun 15 2025

**G-1** -- Nagaland Building (Cuartel) Repair Permit Application on Jun 15 2025

**H** -- Naga City SP Resolution No. 2025-322

**I** -- NHCP Letter to Atty. William R. Enrile II (Nagalang) dated 12 August 2024

**I-1** -- NHCP Letter to Naga City Mayor Maria Leonor Gerona-Robredo dated 14 August 2024

**J** -- Naga City Planning and Development Office Evaluation Report dated 9 September 2025

**K** -- Naga City Office of the City Engineer Letter to Retired Judge Soliman Santos dated November 11, 2025 on the [November 21] Public Presentation on the Conservation Management Plan for the Old Spanish Era Cuartel and Almacen

L – Naga City Office of the Building Official Building Permit No. 0970-2511-0835 dated November 21, 2025 for the Nagaland 2-Storey Commercial Building

M – Letter of Luis Ruben M. General, et al. to Naga City Mayor Robredo and Acting Building Official Elmer T. Albo dated 12 December 2025 strong opposing the Nagaland building permit application as affecting the Naga Ruins

N – Letter of Luis Ruben M. General, et al. to Naga City Mayor Robredo dated 23 December 2025 with urgent requests regarding the Nagaland commercial building permit and ongoing ground preparation fronting the Naga Ruins ICPs

Q -- January 15, 2025 Nagaland commercial building ground preparation fronting the Naga Ruins photographs taken by retired Judge Soliman M. Santos, Jr.

P -- Judicial Affidavit of Soliman M. Santos, Jr.

Q -- Judicial Affidavit of Winstoney Marie SA Salceda-Mazo