

Republic of the Philippines
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
MIMAROPA REGION
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DENR MIMAROPA REGION

represented by RED Lormelyn E.
Claudio,

Complainant

DENR Case No. M-05-22-A

-versus-

For: ***Conduct Prejudicial to
the Best Interest of the
Service and Inefficiency and
Incompetence in the
Performance of Official
Duties***

JOSE SOHRAB L. TOLENTINO,
Utility Worker I,

Respondent.

X-----X

**URGENT MOTION TO BE FURNISHED WITH THE COMPLETE PENRO
AND CENRO COMPOSITE TEAM INVESTIGATION REPORT
DATED SEPTEMBER 02, 2020**

RESPONDENT, unto this Honorable Office, most respectfully states that:

1. The Formal Charge against him dated January 23, 2023 is seemingly based on the Investigation Report dated September 2, 2020. Nonetheless, said report was not appended to the Formal Charge and **Respondent was never served with a copy of the alleged Investigation Report dated 02 September 2020 and its attachment(s), if any;**
2. The matters cited in the Formal are mere self-serving conclusions as they were just selectively lifted from the full Investigation Report. **This is grossly inimical to the interest of the respondent who should be dutifully apprised of the full bases of the accusation/s against him as what is required under the Constitution.** Respondent submits that in all accusations against a party, he should be confronted with all the evidence against him so that he may be able to prepare for his defense and meet the issues head on, to amply protect his interest; and
3. Further, Section 24 of the 2017 RACCS states that: "If the respondent receives a notice of charge with incomplete attachments, **the respondent may request for the lacking documents within 10 days from receipts of the formal/notice of charge and the period to answer will not run until the same is received by respondent.**"

WHEREFORE, premises considered, it is most respectfully prayed that Respondent be furnished with the certified true copy of the full contents of the 02 September 2020 Investigation Report of the PENRO and the CENRO.

Other reliefs just and equitable are likewise prayed for.

Calapan City, Oriental Mindoro for the City of Manila, 16 March 2023.


JOSE SOHRAB L. TOLENTINO
Respondent