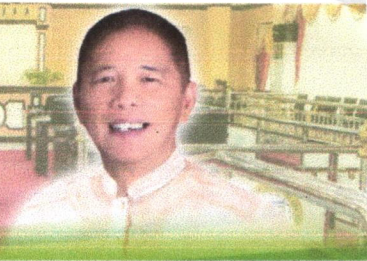


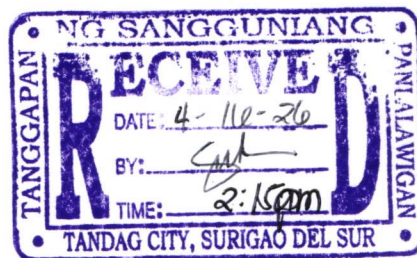


Republic of the Philippines
PROVINCE OF SURIGAO DEL SUR

Office of the Provincial Vice Governor



1ST Endorsement
April 13, 2026



Respectfully forwarded to Mr. Edgar G. Perez II, JD., Secretary to the Sangguniang Panlalawigan, a copy of the DILG Memorandum Circular No. 2026-028 dated April 7, 2026.

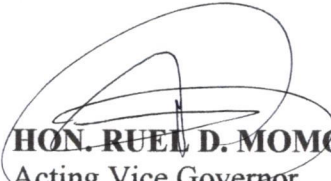
For your information and appropriate action.



PROVINCE OF SURIGAO DEL SUR
Office of the Secretary to the Sangguniang Panlalawigan

Tel. No.: 086-2115832
Email: ossp@surigaodelsur.gov.ph

OSSP-26-05751


HON. RUEL D. MOMO

Acting Vice Governor

21ST Sangguniang Panlalawigan

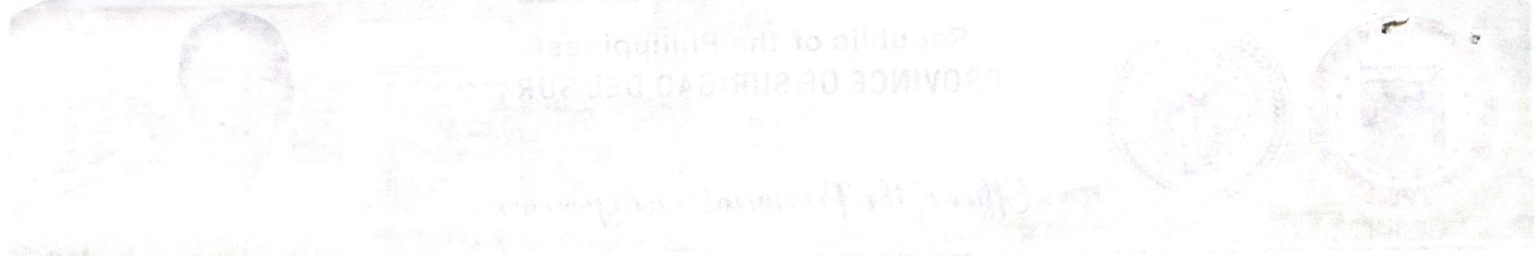
2nd Floor Legislative Building
Capitol Hills, Telaje,
Tandag, Surigao del Sur
Philippines, 8300

Email add: ViceGovernorOfficeTandag@yahoo.com

FB Page: SurSur Provincial Vice Governors Office

Tel No.: (086) 211 - 4303

(086) 211 - 3116



For Information and Reference

Reference is made to the letterhead memorandum dated 11/11/1964, captioned as above, and the letterhead memorandum dated 11/11/1964, captioned as above, both of which are being referred to for information and reference.

For your information and reference, please refer to the letterhead memorandum dated 11/11/1964, captioned as above.

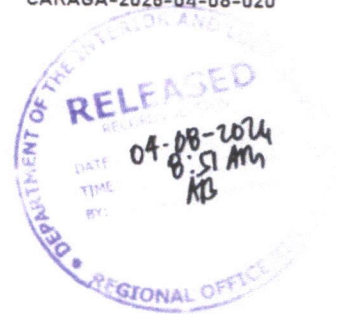
Very truly yours,
[Signature]
[Name]
[Title]

And for information and reference, please refer to the letterhead memorandum dated 11/11/1964, captioned as above, and the letterhead memorandum dated 11/11/1964, captioned as above, both of which are being referred to for information and reference.



CARAGA-2026-04-08-020

Republic of the Philippines
DEPARTMENT OF THE INTERIOR AND LOCAL GOVERNMENT
Region XIII (CARAGA REGION)
Purok 1-A, Barangay Doongan, Butuan City
www.caraga.dilg.gov.ph



MEMORANDUM

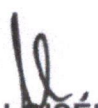
TO : ALL DILG CITY AND PROVINCIAL DIRECTORS, OUTCOME MANAGERS, PROGRAM MANAGERS, AND FIELD OFFICERS
DILG-Caraga

SUBJECT : DISSEMINATION OF DILG MEMORANDUM CIRCULAR NO. 2026-028: REMINDER ON THE INCLUSION OF THE VICE-LOCAL CHIEF EXECUTIVE AND PUNONG BARANGAY IN THE DETERMINATION OF QUORUM IN THE SANGGUNIAN.

DATE : 7 April 2026

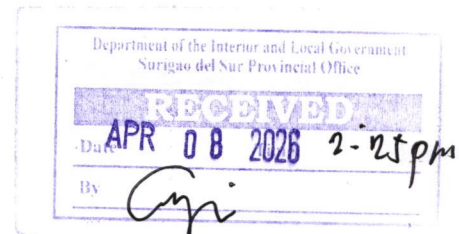
In line with the foregoing, all concerned are hereby directed to ensure the widest dissemination of the attached DILG Memorandum Circular No. 2026-028.

For information and guidance.


MARIA LOISELLA E. LUCINO, CESO III
Regional Director

Encl: DILG MEMORANDUM CIRCULAR NO. 2026-028

LEGAL/MLEL/DAS/fmmmp



Send to:
All DILG City and Provincial Offices
(via DMS)

VICE GOVERNOR'S OFFICE
(RECEIVED)
DATE: 4/8/26 TIME: 2:27 PM



"Matino, Mahusay at Maaasahan"
Trunkline No. (085) 975-9830 to 34
RegionalOffice@caraga.dilg.gov.ph
2026-03-30-126



10-00-00-00-010
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10-00-00-00-010

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
SALT LAKE CITY, UTAH

MEMORANDUM

TO: ALL BLM CITY MANAGERS AND DISTRICT DIRECTORS
FROM: BLM CITY MANAGER, SALT LAKE CITY
SUBJECT: [Illegible]

SUBJECT: DISSEMINATION OF BLM'S RECENT HISTORY CIRCULAR NO. 3098-02, REMINDER ON THE IMPORTANCE OF THE VICE-LOCAL CHIEF, EXECUTIVE AND POLITICAL LEADERSHIP IN THE DETERMINATION OF ORDER IN THE COUNTRY.

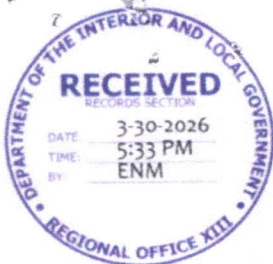
DATE: [Illegible]
[Illegible]
[Illegible]

For information and guidance

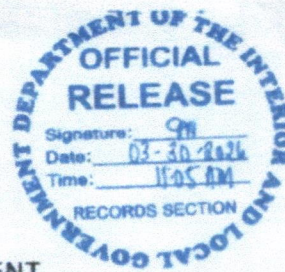
ALL BLM CITY MANAGERS AND DISTRICT DIRECTORS

NOT FOR PUBLICATION
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DATE: [Illegible]

RECEIVED
[Illegible]



2026-03-30-126



Republic of the Philippines
DEPARTMENT OF THE INTERIOR AND LOCAL GOVERNMENT
DILG-NAPOLCOM Center, EDSA cor. Quezon Avenue, West Triangle, Quezon City
www.dilg.gov.ph

MAR 26 2026

MEMORANDUM CIRCULAR
No. 2026-028

TO : ALL PROVINCIAL GOVERNORS, CITY AND MUNICIPAL MAYORS, AND PUNONG BARANGAYS, VICE-GOVERNORS, VICE-MAYORS, MEMBERS OF THE SANGGUNIANG PANLALAWIGAN, SANGGUNIANG PANLUNGSOD, SANGGUNIANG BAYAN, AND SANGGUNIANG BARANGAY, DILG REGIONAL, PROVINCIAL AND CITY DIRECTORS, AND ALL OTHER CONCERNED

SUBJECT : REMINDER ON THE INCLUSION OF THE VICE-LOCAL CHIEF EXECUTIVE AND PUNONG BARANGAY IN THE DETERMINATION OF QUORUM IN THE SANGGUNIAN

I PURPOSE

This Memorandum Circular is issued to remind and reiterate the proper interpretation and application of the law on the determination of quorum in the sanggunian, particularly on the inclusion of the Vice-Local Chief Executive (Vice-Governor / Vice-Mayor), and, at the barangay level, the Punong Barangay, consistent with existing statutory provisions, jurisprudence, and Department opinions.

II LEGAL BASES

1. Sections 447(a), 457(a), and 467(a), Republic Act No. 7160 (Local Government Code of 1991) expressly provide that the Vice-Governor or Vice-Mayor, as the case may be, serves as the presiding officer of the sanggunian, together with the regular sanggunian members and other statutory members
2. Section 390, Republic Act No. 7160 provides that the Punong Barangay serves as the presiding officer of the Sangguniang Barangay.
3. Section 53, Republic Act No. 7160 provides that a majority of all the members of the sanggunian who have been elected and qualified shall constitute a quorum.
4. Jurisprudence, as early as *Zamora v. Governor Caballero*¹ in 2004, has consistently construed the phrase "all the members" to refer to the entire membership of the sanggunian as constituted by law, including the presiding officer.

¹ *Zamora v. Caballero*, id. at 491-492

5. DILG Opinion No. 46, Series of 2007 (02 July 2007) categorically ruled that the Vice-Mayor, being the presiding officer of the sanggunian, forms part of its membership and must be included in determining the existence of a quorum pursuant to Section 53 of the Local Government Code. This opinion was cited in the Supreme Court's En Banc ruling in La Carlota City, Negros Occidental, represented by its Mayor, Hon. Jeffrey P. Ferrer, and the Sangguniang Panlungsod of La Carlota City, represented by its Vice-Mayor, Hon. Demie John C. Honrado v. Atty. Rex G. Rojo².

III DISCUSSION

The composition of the sanggunian as the local legislative body is expressly fixed by law. The Vice-Local Chief Executive, while exercising limited voting powers, is an integral component of the sanggunian by virtue of being its presiding officer.

Consistent with the Local Government Code, jurisprudence, and long-standing administrative interpretation by the Department, the determination of quorum must be based on the entire membership of the sanggunian, as constituted by law, and not merely on the number of regular voting members present.

Any interpretation excluding the Vice-Local Chief Executive or the Punong Barangay from quorum computation finds no statutory basis and is inconsistent with prevailing legal doctrine.

IV GUIDANCE

Accordingly, all concerned are hereby reminded and guided that:

1. In determining the existence of a quorum in the sanggunian at all levels, the VICE-GOVERNOR OR VICE-MAYOR, as presiding officer, SHALL BE INCLUDED in the computation of the total membership.
2. At the barangay level, the PUNONG BARANGAY, as presiding officer of the Sangguniang Barangay, SHALL LIKEWISE BE INCLUDED in determining quorum.
3. Local legislative bodies are enjoined to ensure that sanggunian sessions, resolutions, ordinances, and proceedings comply with the foregoing rule to avoid questions on the validity of deliberations and legislative actions.

V EFFECTIVITY

This Memorandum Circular shall take effect immediately and shall remain in force unless modified or revoked by law, jurisprudence, or subsequent issuances.

VI APPROVING AUTHORITY


JUANITO VICTOR C. REMULLA
Secretary



