

plated. The moment the honesty, morality or integrity of a public officer is seriously impeached he can and should be separated. It is essential that public employees be not only efficient but also morally clean and upright, for in no other way can the good name and dignity of the service be maintained. In cases of immorality, for example, it is immaterial whether the offended woman has consented or not, or is of unchaste reputation, or is of age. Aside from the injury done to private parties, there is the insult to the state and the highly demoralizing effects of such act when committed by public officers." ⁵³

Conclusions

From all the foregoing considerations, I conclude :

1. That the President of the Philippines, as the Administrative Chief or Head of the Administration, has power of general supervision over *the local governments*. This is our political tradition learned from the French centralized administrative system through Spain, our first mother country, owing to which we should logically look, if we may, upon the practices of France ⁵⁴ or of England ⁵⁵ for guidance as to the meaning of "supervision" from one level of government to another, a system opposite the "American System."
2. That the President of the Philippines, as the Executive and the Administrative Chief or Head of the Administration has power of removal (and therefore control) and supervision over not only the public officers of the local governments of any category, arising from his duty to see that the laws be faithfully executed. This duty of supervision, which may include control, is distinct and separate from the President's power of general supervision over the local governments.
3. That the President of the Philippines, as the Administrative Chief, has control not only of all the executive

⁵³ Director of Civil Service, *Twenty-Ninth Annual Report* (Bureau of Printing, Manila, 1929), p. 18.

⁵⁴ See notes 18 to 21, *supra*.

⁵⁵ See note 22, *supra*.

departments, bureaus, or offices, but also over the local governments when these act as agencies of said departments, bureaus, or offices in respect to the execution of their respective functions within the jurisdiction of said local governments, as is the practice of England.

4. That the President of the Philippines, as the Administrative Chief, has power of removal of those under the "merit system" distinct from his power of removal of those under the "political" and "patronage" systems.