

Constitutional Law 1: Case Digests

1. Macalintal v. COMELEC (G.R. No. 263590 and 263673)

The Doctrine: While Congress has the power to fix the date of elections, it cannot postpone them indefinitely or repeatedly without a **compelling state interest**. Postponement cannot be used to extend the terms of elective officials, as it bypasses the voters' right to choose their leaders at regular intervals.

The Facts: Congress enacted R.A. No. 11935, which moved the December 2022 Barangay and Sangguniang Kabataan Elections (BSKE) to October 2023. The law also allowed sitting officials to remain in a "hold-over" capacity. Atty. Romulo Macalintal challenged the law, arguing that Congress had overstepped its authority by effectively extending the terms of office, a power that belongs to the people.

- **The Conflict:** Congress passed a law (RA 11935) to move the 2022 Barangay/SK elections to 2023.
- **The Reason:** They claimed the money (\$P8\$ Billion) was needed for pandemic recovery.
- **The Argument:** Atty. Macalintal sued, saying Congress can't just "extend" terms of sitting officials by moving the goalposts of an election.

The Issue: Does the legislative power to fix the date of elections include the power to postpone them and extend the terms of sitting officials?

The Ruling: The Supreme Court declared the law **unconstitutional**. It held that the right to vote includes the right to vote *on time*. The Court ruled that

"budgetary reasons" (i.e., reallocating funds to address the pandemic) are insufficient to justify infringing a fundamental right. Although the law was struck down, the Court allowed the October 2023 elections to proceed for practicality, but mandated that the next BSKE must strictly follow the three-year interval.

2. Francisco v. House of Representatives (G.R. No. 160261)

The Doctrine: The **"One-Year Bar Rule"** (Art. XI, Sec. 3, par. 5) prevents the initiation of impeachment proceedings against the same official more than once within a period of one year. "Initiation" begins the moment a verified complaint is filed and referred to the proper committee.

The Facts: In 2003, a second impeachment complaint was filed against Chief Justice Hilario Davide Jr., just months after a first complaint had been filed and dismissed. The petitioners argued that this second complaint violated the Constitution's limit on the frequency of impeachment.

- **The Conflict:** A second impeachment case was filed against Chief Justice Davide just months after the first one failed.
- **The Rule:** The Constitution says you can only "initiate" impeachment once a year.
- **The Story:** The Court had to decide if "initiation" means the filing of the complaint or the actual trial in the Senate.

The Issue: Is the filing of a second impeachment complaint within the same year a "political question" beyond judicial review, and does it violate the one-year bar?

The Ruling: The Court ruled that it was **justiciable** (not a political question) because the issue involved a clear violation of a constitutional limit. The Court held that the second complaint was **unconstitutional** because "initiation" does not mean the actual trial in the Senate; it starts at the House of Representatives. To allow multiple filings in a year would paralyze the government.

3. Manila Prince Hotel v. GSIS (G.R. No. 122156)

The Doctrine: Constitutional provisions are presumed **self-executing**. The "**Filipino First Policy**" (Art. XII, Sec. 10) is a mandatory rule that does not need a specific law from Congress to be enforced.

The Facts: The GSIS held a public bidding for 51% of Manila Hotel's shares. A Malaysian firm outbid the Manila Prince Hotel (a Filipino firm). Manila Prince Hotel then matched the Malaysian bid and claimed they should be preferred under the "Filipino First Policy." GSIS refused, arguing the policy was just a "guide" for the legislature.

- **The Conflict:** GSIS auctioned 51% of the Manila Hotel.
- **The Bid:** A Malaysian firm won. Manila Prince Hotel (Filipino) matched the bid later.
- **The Story:** GSIS refused the Filipino bid, saying the "Filipino First" rule in the Constitution was just a suggestion. The Court had to decide if it was a mandatory law.

The Issue: Is the Filipino First Policy self-executing, or is it a non-binding principle?

The Ruling: The Court ruled in favor of the hotel. It held that the Constitution is a fundamental law, not a mere "moral declaration." Since the Manila Hotel is part of the **National Patrimony**, the GSIS was duty-bound to prefer the Filipino bidder over the foreigner when the bids were equalized.

4. Republic v. Sandiganbayan (G.R. No. 104768)

The Doctrine (Justice Puno's Separate Opinion): During a "revolutionary government" (the interregnum between the 1973 and 1987 Constitutions), the Bill of Rights may be legally suspended, but the State remains bound by **Natural Law** and **International Human Rights** (like the UDHR).

The Facts: The PCGG seized several items from the Marcoses during the 1986 revolution without a judicial warrant. The Sandiganbayan later excluded these as evidence. The Republic argued that since there was no Constitution in 1986, there were no "rights" against search and seizure.

- **The Conflict:** In 1986, right after the EDSA Revolution, the PCGG raided the Marcoses' home without a warrant.
- **The Gap:** There was no Constitution at that moment (the old one was gone, the new one hadn't born).
- **The Story:** Justice Puno argued that even without a "Bill of Rights," the government is bound by higher "Natural Law" to respect human rights.

The Issue: Were the seizures valid even if no Constitution was in effect at the time?

The Ruling: The Court ruled the seizures were valid because the Bill of Rights was not yet operational. However, **Justice Puno's Separate Opinion** argued that human rights are **innate** and do not come from a Constitution. Therefore,

the government is always bound to respect the "core" of human dignity even in a revolution.

5. Tañada v. Angara (G.R. No. 118295)

The Doctrine: The "National Economy" provisions of the Constitution do not mandate a policy of **isolationism**. The Constitution allows for global competitiveness and interdependence, provided it is for the "common good."

The Facts: Senator Wigberto Tañada challenged the Senate's ratification of the **World Trade Organization (WTO)** Agreement. He argued that the WTO violated the constitutional mandate to develop a "self-reliant and independent national economy" and the "Filipino First" rule.

- **The Conflict:** The Philippines joined the World Trade Organization (WTO).
- **The Fear:** Senator Tañada feared this would kill local industries and violated "Filipino First."
- **The Story:** The Court looked at whether "economic sovereignty" means we must be isolated or if we can compete globally.

The Issue: Does joining the WTO violate the economic sovereignty of the Philippines?

The Ruling: The Court ruled the treaty was **constitutional**. It held that "sovereignty" is not absolute and may be limited by treaties. The Court emphasized that while the Constitution protects Filipino enterprises, it does not require the State to shield them from all foreign competition at the expense of the nation's participation in the global market.

6. Macariola v. Asuncion (114 SCRA 77)

The Doctrine: The prohibition under Article 1491 of the Civil Code (forbidding judges from buying property in litigation) only applies **while the litigation is pending**.

The Facts: Judge Asuncion presided over a land partition case. Years after the case was final and executory, he became a partner in a company that purchased a portion of that land. He was charged with violating the Code of Commerce and the Civil Code.

The Issue: Is a judge forever barred from buying property that was once handled in his court?

The Ruling: No. The Court cleared the judge of the legal charges, stating that the property was no longer *sub judice* (under judicial consideration) at the time of purchase. However, the Court **admonished** him for "impropriety," reminding judges that they must avoid even the *appearance* of a conflict of interest.

7. Alih v. Castro (151 SCRA 279)

The Doctrine: Military "necessity" or the "notorious" reputation of a suspect is **not a substitute for a search warrant**. The Bill of Rights protects everyone—both the "saints" and the "sinners."

The Facts: Military forces conducted a raid (a "zona") on the compound of the Alih group in Zamboanga following the killing of a general. They entered houses and seized firearms without any warrants, claiming it was an "emergency" and that the occupants were dangerous criminals.

- **The Conflict:** Soldiers raided the Alih compound in Zamboanga without warrants because they were "dangerous rebels."
- **The Scene:** They broke down doors and seized guns during a "military operation."
- **The Story:** The military argued that "notorious" criminals don't deserve the same warrant protections as others.

The Issue: Can a warrantless search be justified by the fact that the targets are known criminals or that there is a military emergency?

The Ruling: The Court ruled the search was **illegal**. It famously held that the "protection of the law" is not a "shield for the guilty," but a safeguard for the innocent. If the military had time to plan the raid, they had time to get a warrant. The evidence seized was declared inadmissible.

8. Philippine Coconut Producers Federation (COCOFED) v. Republic (G.R. Nos. 177857-58)

The Doctrine: The "Coconut Levy Funds" are **public funds** because they are raised through the State's taxing power. Property purchased using these funds is owned by the government in trust for the coconut farmers.

The Facts: During the Marcos administration, several laws were passed imposing levies on the sale of coconut products. These funds were used to acquire a large block of shares in San Miguel Corporation (SMC). COCOFED argued that these shares were the private property of the farmers. The Republic, through the PCGG, argued that since the money was collected via the State's coercive power, the assets were public.

- **The Conflict:** During the 70s, "Coco Levy" taxes were taken from poor farmers.

- **The Purchase:** The money was used to buy huge shares in San Miguel Corp (SMC).
- **The Story:** Decades later, everyone fought over the shares: did they belong to the private farmers or the public government?

The Issue: Are funds raised through a special levy (tax) for a specific industry considered private property or public funds?

The Ruling: The Court ruled they are **public funds**. The Court held that the coconut levy was an exercise of the **Taxing Power**. Even if the money was intended for the benefit of a specific group (farmers), once collected by the State, it becomes public money. Therefore, the SMC shares are "owned by the Government in trust for the coconut industry."

9. Francisco, Jr. v. House of Representatives (G.R. No. 160261)

The Doctrine: The Supreme Court's power of judicial review is a **duty** to ensure that no branch of government acts with grave abuse of discretion. This includes the power to check if the Legislature followed the procedural requirements of the Constitution during impeachment.

The Facts: A second impeachment complaint was filed against CJ Davide Jr. within the same year that a first complaint was initiated. The House argued that impeachment is a "political question" and the Court had no business telling them how to run their proceedings.

The Issue: Is the internal process of impeachment a "political question" that is completely immune from judicial review?

The Ruling: The Court ruled that it is **justiciable**. While the *merits* of impeachment are political, the *procedure* is constitutional. The Court held

that it has the power to strike down acts of Congress that violate the "One-Year Bar Rule," as the Court is the final arbiter of constitutional limits.

10. Belgica v. Executive Secretary (G.R. No. 208566)

The Doctrine: The **Separation of Powers** dictates that Congress makes the laws (the budget), but the Executive implements them. "Post-enactment" intervention by legislators in the budget is unconstitutional.

The Facts: This case challenged the "Pork Barrel" (PDAF) system. Under this system, after the national budget was passed, individual lawmakers could still "identify" which specific projects their allocated funds would go to.

- **The Conflict:** The "Pork Barrel" scam exploded (Janet Napoles).
- **The System:** Lawmakers got billions but could only "point" to projects after the budget was signed.
- **The Story:** The Court ruled this violated the separation of powers because lawmakers were acting like "implementers" (Executive).

The Issue: Does allowing legislators to choose projects *after* the budget is already law violate the Separation of Powers?

The Ruling: The Court ruled the PDAF **unconstitutional**. It held that once the budget is passed, the legislator's job is done. Picking projects is an **Executive function**. Furthermore, the system undermined the President's **Line-Item Veto** power, as the President couldn't veto a project that hadn't been identified yet.

11. Angara v. Electoral Commission (G.R. No. L-45081)

The Doctrine: This is the foundational case for **Judicial Review**. The Judiciary is the "moderator" and "final arbiter" that allocates constitutional boundaries between the different branches of government.

The Facts: Jose Angara won a seat in the National Assembly. His election was confirmed by the Assembly. However, the Electoral Commission (a separate constitutional body) allowed a late protest against him. Angara argued that the National Assembly's confirmation was final and the Commission had no jurisdiction.

- **The Conflict:** A "late" election protest was filed against Jose Angara.
- **The Body:** The National Assembly said "too late," but the Electoral Commission said "we'll hear it anyway."
- **The Story:** This is the foundational case where the Court said, "We are the referee between these two branches."

The Issue: Does the Supreme Court have the power to resolve a conflict of jurisdiction between two constitutional bodies?

The Ruling: The Court ruled in the **affirmative**. It is famously stated that the Constitution is a definition of the powers of government. When those powers conflict, the Judiciary must step in—not to assert superiority over other branches, but to assert the **supremacy of the Constitution**.

12. Sanidad v. COMELEC (G.R. No. L-44640)

The Doctrine: In times of emergency (like Martial Law) where the legislature is abolished, the President may exercise **constituent power** (proposing amendments) to prevent a vacuum in the law, provided the changes are submitted to the people for ratification.

The Facts: During the Martial Law interregnum, President Marcos issued decrees proposing amendments to the 1973 Constitution. Petitioners argued that the President only has executive powers and cannot propose constitutional changes—that power belongs to a Convention or a Parliament.

- **The Conflict:** Martial Law was in effect. No Congress.
- **The Act:** President Marcos proposed amendments to the Constitution himself.
- **The Story:** Can a President "be" the Congress and propose constitutional changes alone?

The Issue: Can the President propose constitutional amendments when there is no sitting Legislature?

The Ruling: The Court ruled **yes**. It held that while the President's power is usually limited, the "extraordinary necessity" of the time justified the exercise of constituent power. However, the Court maintained that it still had the power to review whether the proposal process followed the "spirit" of the Constitution.

13. **People v. Ferrer (G.R. No. L-32613-14)**

The Doctrine: A law is **not** a "Bill of Attainder" if it defines a crime and requires a judicial trial to determine a person's guilt.

The Facts: The Anti-Subversion Act (RA 1700) outlawed the Communist Party of the Philippines (CPP). Defendants argued the law was a **Bill of Attainder** because it "legislatively convicted" members of the CPP without a trial.

- **The Conflict:** The Anti-Subversion Act made being a Communist a crime.

- **The Defense:** Defendants argued this was a "Bill of Attainder" (punishment without trial).
- **The Story:** The Court had to decide if outlawing an organization is the same as convicting its members.

The Issue: Is a law that outlaws a specific organization unconstitutional for being a Bill of Attainder?

The Ruling: The Court ruled the law **constitutional**. It explained that a Bill of Attainder is a law that punishes specific, named individuals without a trial. RA 1700 did not do this; it merely made "membership with intent" a crime. The State still had to prove in court that the accused was a member and had the intent to overthrow the government.

14. **Abueva v. Wood (45 Phil. 612)**

The Doctrine: The Judiciary cannot use a **Writ of Mandamus** to compel the Legislature to perform a "discretionary" act, as this would violate the principle of Separation of Powers.

The Facts: Petitioners wanted to inspect the financial vouchers of the Philippine Independence Commission, which was controlled by legislative leaders. The leaders refused to grant access.

- **The Conflict:** People wanted to see the receipts/vouchers of a government commission.
- **The Denial:** The leaders of the Legislature refused to show the books.
- **The Story:** The Court refused to force them, saying the "inner workings" of the Legislature are private to that branch.

The Issue: Can the Court order the Legislature to open its internal books to the public?

The Ruling: The Court ruled **no**. At that time, the Court held that the internal management of legislative records was a matter of "legislative discretion." To order them to produce the records would be to exert control over a co-equal branch.

15. Lambino v. COMELEC (G.R. No. 174153)

The Doctrine: A **People's Initiative** can only be used for **Amendments** (isolated or piecemeal changes), not for **Revisions** (overhaul of the government structure or basic principles).

The Facts: The Lambino Group gathered signatures to change the Philippine government from a **Presidential-Bicameral** system to a **Parliamentary-Unicameral** system through a People's Initiative. The COMELEC denied the petition.

- **The Conflict:** A group tried to change the government from Presidential to Parliamentary via a signature drive.
- **The Flaw:** They didn't show the signers the full text of the changes.
- **The Story:** The Court had to define if this was a "small change" (Amendment) or a "big overhaul" (Revision).

The Issue: Can the change from a Presidential to a Parliamentary system be done via a People's Initiative?

The Ruling: The Court ruled **No**. Such a drastic change is a **Revision**, which requires a Constitutional Convention or Congress acting as a Constituent Assembly. Furthermore, the Court found the initiative invalid because the "full text" of the changes was not shown to the people before they signed.

16. Tolentino v. COMELEC (G.R. No. L-34150)

The Doctrine: The "**Doctrine of Submission**" requires that all proposed amendments to the Constitution be submitted to the people for ratification in a **single, simultaneous plebiscite**.

The Facts: In 1971, the Constitutional Convention proposed an amendment to lower the voting age to 18. They wanted to hold a "partial plebiscite" for this specific change ahead of other proposed changes.

- **The Conflict:** A convention wanted to lower the voting age to 18 immediately.
- **The Plan:** They wanted a "mini-plebiscite" just for that one rule.
- **The Story:** The Court said you can't submit amendments to the people "piece by piece." It's all or nothing.

The Issue: Can a single amendment be submitted for ratification separately from other proposed amendments?

The Ruling: The Court ruled **No**. The people must be able to see the "entire picture" of the proposed changes before voting. Piecemeal ratification is unconstitutional because it prevents the voters from understanding the cumulative effect of the amendments on the whole Constitution.

17. Garcia v. COMELEC (G.R. No. 111230)

The Doctrine: The power of **Initiative and Referendum** is a "reserved power" of the people. It is the "highest form of direct democracy," and laws must be interpreted to facilitate, not hinder, its exercise.

The Facts: Residents of Morong, Bataan, wanted a referendum to challenge a local resolution. The COMELEC denied it, claiming there was no law specifically allowing a referendum on local resolutions.

- **The Conflict:** People in Bataan wanted to vote "No" on a local law via a referendum.
- **The Obstacle:** COMELEC said there was no specific law allowing that.
- **The Story:** The Court ruled that the "Power of the People" to vote on laws is inherent in the Constitution.

The Issue: Is the people's right to an initiative and referendum self-executing for local matters?

The Ruling: The Court ruled **Yes**. It emphasized that the 1987 Constitution went beyond "representative democracy" to "direct democracy." The Court held that the people have the power to approve or reject any act or law passed by a local legislative body.

18. Mabanag v. Lopez Vito (78 Phil. 1)

The Doctrine: The **Enrolled Bill Theory** states that a resolution signed by the leadership of Congress is conclusive proof of its passage. The Court will not look at the legislative journals to verify the vote count.

The enduring doctrine from Mabanag is that an Enrolled Bill is conclusive upon the courts. It establishes that the Judiciary will not investigate the internal proceedings of Congress to check for irregularities so long as the bill or resolution is properly authenticated. Furthermore, it reinforces the idea that certain "political questions"—those committed by the Constitution to the political departments—are immune from judicial interference.

The Facts: This involved the Parity Rights Amendment. Petitioners argued the 3/4 vote was not reached because suspended members were not counted.

The case arose in the aftermath of the 1946 elections. The Philippine Congress was in the process of proposing an amendment to the 1935 Constitution to grant "Parity Rights" to United States citizens regarding the exploitation of Philippine natural resources. Under the 1935 Constitution, a proposal for amendment required a three-fourths (3/4) vote of all the members of each House.

However, a controversy emerged because three Senators and eight Representatives were suspended or prevented from taking their seats due to alleged electoral fraud and terrorism in certain provinces. When the vote for the Parity Amendment was taken, these eleven members were excluded from the count. The resolution passed by the required 3/4 margin only if the total membership was calculated excluding the suspended members. Alejo Mabanag and his fellow petitioners argued that the 3/4 threshold should have been based on the total number of seats in Congress, regardless of whether the occupants were suspended. They filed a petition for prohibition to prevent the Commission on Elections from holding a plebiscite.

- **The Conflict:** Congress voted for "Parity Rights" for Americans.
- **The Cheating:** They didn't count suspended members in the 3/4 total.
- **The Story:** The Court refused to check the math, saying "if the Speaker of the House signed it, we believe it."

The Issue: Can the Court check if Congress correctly counted the 3/4 vote?

The Supreme Court was primarily tasked with resolving two fundamental issues:

1. **Justiciability:** Whether the Court has the jurisdiction to review the wisdom and the internal process of Congress in proposing a constitutional amendment.
2. **Evidence of Enactment:** Whether the Court can look behind the authenticated resolution (the Enrolled Bill) and examine the legislative journals to verify if the 3/4 vote requirement was actually met.

The Ruling: The Court ruled **No**. It held that the proposal of an amendment is a **Political Question**. Once the Senate President and House Speaker sign the resolution, the Court accepts it as "absolute verity."

The Supreme Court dismissed the petition, refusing to interfere with the actions of Congress. The ruling was anchored on two major legal pillars.

First, the Court applied the Political Question Doctrine. It ruled that the process of amending the Constitution is a "highly political function" performed by Congress in its sovereign capacity. The Court reasoned that because the proposal is merely a preliminary step that ultimately requires the "sovereign people" to decide during a plebiscite, the Judiciary has no business intervening. It categorized the dispute as a political matter rather than a legal or justiciable one.

Second, the Court upheld the Enrolled Bill Theory. It held that a legislative act (or resolution) that has been duly signed by the presiding officers of both Houses—the Senate President and the Speaker—and certified by their respective secretaries, carries with it an "absolute verity." This authenticated document is conclusive proof of its own contents and the regularity of its passage. The Court emphasized that it would not go behind the enrolled resolution to inspect legislative journals, as doing so would violate the

principle of Separation of Powers and show a lack of respect for a co-equal branch of government.

19. Gonzalez v. COMELEC (21 SCRA 774)

The Doctrine: Congress can simultaneously act as a **Legislative Body** (passing regular laws) and a **Constituent Assembly** (proposing amendments), provided it follows the specific requirements for each.

The Facts: Congress passed a resolution proposing amendments and, on the same day, passed a law (RA 4913) calling for a plebiscite. Petitioners argued Congress cannot do both at once.

- **The Conflict:** Congress proposed an amendment and simultaneously passed a law for the election.
- **The Argument:** Petitioners said they can't do "Constituent" and "Legislative" work at the same time.
- **The Story:** The Court ruled Congress can wear "two hats" in one day.

The Issue: Is it constitutional for Congress to propose amendments and provide for the plebiscite simultaneously?

The Ruling: The Court ruled **Yes**. The power to propose amendments is a "constituent power," and the power to call a plebiscite is a "legislative power." Congress may exercise both functions in the same session.

20. Almarino v. Alba (127 SCRA 69)

The Doctrine: The Court will not interfere with the **content** of a proposed amendment while it is still in the process of being submitted to the people, as it is a political question.

The Facts: Petitioners challenged the constitutionality of several proposed amendments (including the creation of the Office of the Vice President) before they were ratified in a plebiscite.

- **The Conflict:** People sued to stop a plebiscite because the questions were "too hard to understand."
- **The Story:** The Court said the "clarity" of the amendment is for the voters to judge, not the judges.

The Issue: Can the Court stop a plebiscite because the proposed amendments are allegedly "confusing"?

The Ruling: The Court ruled **No**. The Court held that the "wisdom" of the amendments is for the people to decide at the ballot box. Unless there is a clear violation of the process of amendment, the Court remains hands-off.

21. Defensor-Santiago v. COMELEC (G.R. No. 127325)

The Doctrine: Republic Act No. 6735 (The Initiative and Referendum Act) is **insufficient** or "inadequate" to cover a People's Initiative for constitutional amendments.

The Facts: "PIRMA" gathered signatures to lift the term limits of elective officials. Senator Miriam Defensor-Santiago challenged this.

- **The Conflict:** A group (PIRMA) tried to lift term limits for President Ramos via the People's Initiative.
- **The Ruling:** Senator Miriam sued, and the Court found the "Initiative Law" was too weak to cover constitutional changes.

The Issue: Is there a valid law that allows the people to initiate constitutional amendments?

The Ruling: The Court ruled **No**. It held that while RA 6735 covers local and national laws, it does not provide a sufficient "subtitle" or procedure for constitutional changes. This case is famous for halting the "Chacha" (Charter Change) attempt under the Ramos administration.

22. Lawyers League v. Aquino (G.R. No. 73748)

The Doctrine: The legitimacy of a government established via a **Revolution** is a **Political Question** and is beyond the jurisdiction of the Court.

The Facts: Lawyers challenged the legitimacy of President Corazon Aquino's government, arguing it was not established according to the 1973 Constitution.

- **The Conflict:** Lawyers sued Cory Aquino, saying she wasn't a "legal" President because of the revolution.
- **The Story:** The Court said "the people have spoken," and the success of a revolution is a political fact the Court won't touch.

The Issue: Can the Court rule on whether the Cory Aquino government is "legal"?

The Ruling: The Court dismissed the petition. It ruled that the Aquino government was a **De Jure** government because it was accepted by the people, recognized by the international community, and was in effective control of the country.

23. Javellana v. Executive Secretary (G.R. No. L-36142)

The Doctrine: If a Constitution is already being "enforced and obeyed" by the people and the government, the Court will not interfere with its validity, even if the ratification process was flawed.

The Facts: President Marcos declared the 1973 Constitution ratified by "Citizens' Assemblies" instead of a formal plebiscite.

- **The Conflict:** Martial Law-era 1973 Constitution was "ratified" by people raising their hands in "Citizens' Assemblies."
- **The Story:** The Court admitted it was messy but said, "The new Constitution is already in effect, so we won't stop it now."

The Issue: Is the 1973 Constitution validly in force?

The Ruling: The Court famously concluded that there was "**no further judicial obstacle**" to the 1973 Constitution being considered in effect. It was an acknowledgment that the "political reality" of the time had overtaken the legal arguments.

24. **Sanders v. Veridiano (G.R. No. L-46930)**

The Doctrine: State immunity extends to public officers when the acts complained of were performed in the **discharge of their official duties** and within the scope of their authority.

The Facts: Sanders and Rossi (officials at a US Naval Station in Olongapo) were sued for libel by Filipino employees after Sanders wrote a letter recommending the termination of the employees' services.

- **The Conflict:** A US Navy boss wrote a bad review for an employee.
- **The Suit:** The employee sued for libel in a Filipino court.
- **The Story:** The Court said "he was doing his job," so he is protected by the State's immunity.

The Issue: Can the US officials be sued in Philippine courts, or are they protected by state immunity?

The Ruling: The Court ruled that they are **immune**. The letters were written in their official capacities as managers. A suit against a public officer for acts done in his official capacity is, in effect, a suit against the State, which cannot prosper without the State's consent.

25. **Arigo v. Swift (G.R. No. 206510)**

The Doctrine: While foreign warships are entitled to sovereign immunity, the State may still be held liable for environmental damage under international law.

The Facts: The *USS Guardian* ran aground on the Tubbataha Reef. Petitioners filed for a Writ of Kalikasan.

- **The Conflict:** A US ship crashed into the Tubbataha Reef.
- **The Suit:** Filipinos sued for environmental damage.
- **The Story:** The US officers were immune from suit because it was a "military mission," but the US still had to pay damages.

The Issue: Does the principle of State Immunity bar a suit against US naval officers for environmental damage?

The Ruling: Yes. The Court held that the ship was on official military business (*jure imperii*). However, the Court noted that under the Visiting Forces Agreement (VFA), the US government has already waived some immunity by agreeing to pay for damages caused by its personnel.

26. **Philippine Textile Research Institute (PTRI) v. CA (G.R. No. 223319)**

The Doctrine: An agency that performs **governmental functions** is immune from suit, even if it is not incorporated.

The Facts: PTRI (an agency under DOST) entered into a contract for the construction of a building. A dispute arose, and the contractor sued for payment.

- **The Conflict:** A government agency (PTRI) hired a builder and then didn't pay.
- **The Story:** PTRI claimed "you can't sue us, we are the State." The Court said "if you enter a business contract, you can be sued like anyone else."

The Issue: Is PTRI, being an unincorporated government agency, immune from suit?

The Ruling: No. While PTRI performs governmental functions, the Court held that when the State enters into a **business contract**, it descends to the level of a private individual and impliedly waives its immunity (*restrictive application of state immunity*).

27. The Holy See v. RTC (G.R. 101949)

The Doctrine: The Holy See is a foreign sovereign and is immune from local jurisdiction for acts done in the exercise of its sovereign functions (*jure imperii*).

The Facts: The Holy See sold a parcel of land. When the buyer couldn't take possession due to squatters, he sued the Holy See.

- **The Conflict:** The Pope's office (Holy See) sold land. The buyer sued over squatter issues.
- **The Story:** The Court said the Holy See is a "Sovereign State" and buying/selling land for diplomatic reasons is a protected act.

The Issue: Is the sale of land by the Holy See a commercial act (*jure gestionis*) that waives immunity?

The Ruling: No. The Court ruled that the land was not sold for profit, but as part of the administration of the Apostolic Nunciature (diplomatic mission). Thus, it was an act *jure imperii*, and the Holy See is immune.

28. City of Angeles v. Court of Appeals (G.R. No. 97882)

The Doctrine: Local Government Units (LGUs) are not immune from suit for acts that are **proprietary** in nature or when they act as a private corporation.

The Facts: The City of Angeles entered into a contract to donate land. Later, the City tried to revoke the donation.

- **The Conflict:** A City government backed out of a land donation deal.
- **The Story:** The Court ruled that local cities (LGUs) can be sued whenever they enter into private contracts.

The Issue: Can the City be sued for breach of contract?

The Ruling: Yes. Under the Local Government Code, LGUs have the power to "sue and be sued." When an LGU enters into a private contract, it waives its mantle of immunity.

29. Veterans Manpower and Protective Services, Inc. v. CA (G.R. No. 91359)

The Doctrine: A suit against a public officer that results in a **financial liability** for the government is a suit against the State and requires consent.

The Facts: A security agency sued the PC-Chief for refusing to issue them a license.

- **The Conflict:** A security agency sued a General for not giving them a license.
- **The Story:** The Court said the General was acting for the State; suing him was like suing the government's wallet.

The Issue: Is the suit against the PC-Chief a suit against the State?

The Ruling: Yes. The Court held that the PC-Chief was acting in his official capacity. Since a judgment against him would require the government to act or pay, the suit is barred by state immunity.

30. U.S.A. v. Reyes (G.R. No. 79253)

The Doctrine: Immunity is not a shield for **unauthorized or tortious acts** committed by a public officer.

The Facts: A Filipino employee at a US base was searched and humiliated by her supervisor (Bradford). She sued for damages.

- **The Conflict:** A US supervisor (Bradford) strip-searched a Filipino worker.
- **The Story:** The Court said "embarrassing people isn't part of your job description," so immunity doesn't apply to bad behavior.

The Issue: Is the supervisor immune because she worked for the US Navy?

The Ruling: No. The Court ruled that "manhandling" or "slandering" an employee is not part of a supervisor's official duties. Immunity only covers acts within the scope of authority.

31. DFA v. NLRC (G.R. No. 113191)

The Doctrine: International organizations (like the Asian Development Bank or the UN) are immune from local jurisdiction to ensure they can perform their duties without interference.

The Facts: A former employee of the Asian Development Bank (ADB) filed an illegal dismissal case.

- **The Conflict:** An employee of the Asian Development Bank (ADB) was fired and sued for illegal dismissal.
- **The Story:** The Court said "International Banks have special immunity treaties," so the labor court can't touch them.

The Issue: Does the NLRC have jurisdiction over the ADB?

The Ruling: No. The Court held that the ADB is an international organization protected by a headquarters agreement with the Philippines, which grants it immunity from "every form of legal process."

32. Municipality of San Miguel, Bulacan v. Fernandez (G.R. No. L-61744)

The Doctrine: While a municipality may be sued, its **public funds and properties** cannot be seized via a writ of execution.

The Facts: The Municipality lost a case and was ordered to pay. The court issued a garnish order against the Municipality's bank accounts.

- **The Conflict:** A town lost a court case. The winner tried to freeze the town's bank account.
- **The Story:** The Court said "you can't freeze government money," because that money is for the public's benefit (salaries/hospitals).

The Issue: Can government funds be garnished to satisfy a judgment?

The Ruling: No. Public funds are intended for specific purposes (like salaries and services). To allow them to be seized would paralyze the government. The winning party must instead file a claim with the Commission on Audit (COA).

33. Republic v. Feliciano (G.R. No. 70853)

The Doctrine: Consent to be sued must be **express** (via a law) and cannot be implied from the mere silence of the State.

The Facts: Feliciano sued the Republic to quiet title over a piece of land, claiming a Proclamation by the President was an implied waiver of immunity.

- **The Conflict:** Someone sued the government for land, claiming the President "implied" it was okay to sue.
- **The Story:** The Court said "only a Law from Congress" can give permission to sue the State.

The Issue: Does a Presidential Proclamation constitute a waiver of state immunity?

The Ruling: No. Only the **Legislature** (Congress) can waive the State's immunity through a formal law. The President cannot waive it via a proclamation or executive order.

34. Aglipay vs. Ruiz (64 Phil. 201)

The Doctrine: The "Preamble" and the Constitution's secular nature do not prohibit the State from engaging in activities that have a religious connection, provided the purpose is **secular** (e.g., historical or commemorative) and does not involve the use of public funds for a specific church.

The Facts: The Director of Posts issued stamps to commemorate the 33rd International Eucharistic Congress. Aglipay, head of the Philippine Independent Church, challenged this, claiming it violated the separation of Church and State.

- **The Conflict:** The government printed stamps for a Catholic event.
- **The Story:** A rival church leader sued. The Court said "it's for tourism/history, not for preaching," so it's okay.

The Issue: Does the issuance of stamps with religious themes violate the constitutional prohibition against using public money for religious purposes?

The Ruling: No. The Court ruled the purpose was secular: to promote the Philippines as a tourist destination and commemorate an international event. The stamps did not promote a particular religion; the religious connection was merely incidental to the historical event.

35. North Cotabato v. Republic (G.R. No. 183591)

The Doctrine: The "National Territory" cannot be diminished or altered through an executive agreement (the MOA-AD) that effectively creates an independent "state within a state" without constitutional amendment.

The Facts: The government attempted to sign the Memorandum of Agreement on the Ancestral Domain (MOA-AD) with the MILF, which would have created a "Bangsamoro Juridical Entity" (BJE) with its own government and territory.

- **The Conflict:** The government tried to give the MILF a "territory" (MOA-AD) with its own laws.
- **The Story:** The Court stopped it, saying "you can't give away pieces of the National Territory without changing the Constitution."

The Issue: Is the MOA-AD constitutional?

The Ruling: No. The Court ruled that the MOA-AD was unconstitutional because it promised the MILF a "separate state" structure that is not recognized by the 1987 Constitution. Any change to the National Territory must be done through the proper legal and constitutional channels.

36. *Saguisag vs. Ochoa, Jr. (779 SCRA 241)*

The Doctrine: The State has the power to enter into **Executive Agreements** (like EDCA) for the purpose of national defense, and such agreements do not necessarily require Senate ratification if they merely implement existing treaties (like the MDT and VFA).

The Facts: Petitioners challenged the Enhanced Defense Cooperation Agreement (EDCA) between the US and the Philippines, arguing it was a new treaty that needed Senate approval.

- **The Conflict:** The EDCA deal allowed US troops back into Filipino bases.
- **The Story:** Petitioners said it was a "new treaty." The Court said "no, it's just a plan to implement the old treaties."

The Issue: Is EDCA a treaty or an executive agreement?

The Ruling: It is an **Executive Agreement**. The Court ruled that EDCA is an implementation of the 1951 Mutual Defense Treaty. Since it does not establish permanent military bases (but only "agreed locations"), the President could validly sign it without the Senate.

37. *Rep. of the Philippines vs. Rep. of China (The Hague Arbitral Ruling, 2016)*

The Doctrine: The **"Nine-Dash Line"** has no legal basis under international law (UNCLOS). Maritime rights are determined by land features, and "historic rights" cannot override the provisions of the UN Convention on the Law of the Sea.

The Facts: The Philippines challenged China's expansive claims in the South China Sea before the Permanent Court of Arbitration.

- **The Conflict:** China claimed the whole sea with a "Nine-Dash Line."
- **The Story:** The Court in the Hague said "historic maps don't count under modern law (UNCLOS)," so the West Philippine Sea belongs to us.

The Issue: Does China have "historic rights" to the South China Sea within the Nine-Dash Line?

The Ruling: No. The Tribunal ruled that China's claims were incompatible with UNCLOS. It found that none of the features in the Spratlys are "islands" capable of generating an Exclusive Economic Zone (EEZ); they are merely "rocks" or "low-tide elevations." This solidified the Philippines' rights over its **West Philippine Sea** maritime zone.

38. Capitol Wireless Inc. v. Provincial Treasurer of Batangas (G.R. No. 180110)

The Doctrine: Submarine cables laid on the ocean floor within the Philippine territorial sea are considered **real property** and are subject to local real property taxes.

The Facts: Capitol Wireless (CapWire) refused to pay real property taxes on its submarine cables, arguing they were under the sea and outside the jurisdiction of the province.

- **The Conflict:** A company put internet cables on the ocean floor.
- **The Tax:** The Province of Batangas tried to tax the cables.
- **The Story:** The company said "the ocean isn't land." The Court said "the seabed is part of our territory, so pay your taxes."

The Issue: Does the National Territory (and thus local tax jurisdiction) include the seabed and subsoil?

The Ruling: Yes. Under Article 1, the National Territory includes the **seabed and subsoil**. Since the cables are permanently attached to the seabed within the province's territorial waters, they are taxable as real property.

39. Republic v. Provincial Government of Palawan (G.R. Nos. 170867 & 185941)

The Doctrine: The "**Territorial Jurisdiction**" of a province for the purpose of sharing in the proceeds of natural resources (like the Malampaya gas field) is limited to the area defined in its charter and does not automatically extend to the continental shelf.

The Facts: Palawan claimed a 40% share of the Malampaya gas project's proceeds, arguing the field was "within its territory." The National Government

argued it was in the "continental shelf," which belongs to the State, not the province.

- **The Conflict:** The Malampaya gas field is deep in the ocean.
- **The Fight:** Palawan province wanted 40% of the money.
- **The Story:** The Court said "it's too far offshore to be Palawan's; it belongs to the whole country (National Government)."

The Issue: Does the "territorial jurisdiction" of Palawan extend to the offshore area where Malampaya is located?

The Ruling: No. The Court ruled that a province's territory is limited to its land area and the 15-kilometer municipal waters. The continental shelf where Malampaya is located is beyond these limits and belongs to the **National Government**. Thus, Palawan is not entitled to a 40% share by right.

40. Magallona v. Ermita (G.R. No. 187167)

The Doctrine: The **Archipelagic Doctrine** allows the Philippines to draw straight baselines connecting the outermost points of the archipelago. RA 9522 (the Baseline Law) is a valid tool to define maritime zones and does not reduce the country's land territory.

The Facts: Petitioners argued that RA 9522 was unconstitutional because it categorized the Kalayaan Island Group as a "Regime of Islands," which they claimed weakened the Philippines' sovereignty.

- **The Conflict:** A new law (RA 9522) drew "baselines" around the Philippines.
- **The Panic:** People said we were "losing land" by following UN rules.
- **The Story:** The Court said "baselines are just for drawing maritime maps," and they actually help protect our sea rights globally.

The Issue: Does RA 9522 violate the constitutional definition of National Territory?

The Ruling: No. The Court explained that baselines are used to determine where the maritime zones (EEZ, Contiguous Zone) begin. The law is a **statutory tool** to comply with UNCLOS. Categorizing certain areas as a "Regime of Islands" is a strategic move to maximize maritime claims without losing sovereignty over the land.