

Title: Simon, Jr. et al. vs. Commission on Human Rights et al.

Facts: This case involves a petition filed by Brigido R. Simon, Jr., Carlos Quimpo, Carlito Abelardo, and Generoso Ocampo, who are officials of Quezon City, against the Commission on Human Rights (CHR). The petitioners sought to prohibit the CHR from hearing and investigating the case filed by the officers and members of the North EDSA Vendors Association, Incorporated, led by Roque Fermo, which was docketed as CHR Case No. 90-1580. The conflict originated from a demolition notice issued by petitioner Carlos Quimpo, ordering the private respondents to vacate the premises along North EDSA to make way for a "People's Park." Private respondents filed a complaint with the CHR alleging human rights violations and requesting intervention to prevent the demolition. The CHR ordered the petitioners to cease the demolition, subsequently cited petitioners for contempt when the demolition proceeded, and approved financial aid for the affected vendors.

Issues:

1. Whether the CHR has jurisdiction to investigate the alleged violations of the "business rights" of the private respondents.
2. Whether the CHR has the authority to impose fines, such as the P500.00 fine levied against the petitioners.
3. Whether the CHR has the power to disburse funds, such as the P200,000.00 financial aid granted to the vendors affected by the demolition.

Court's Decision:

1. The Supreme Court held that the CHR does not have jurisdiction over the alleged violations in this case. The term "human rights" in the Constitution was intended by the framers to refer specifically to civil and political rights, focusing on severe cases of human rights violations. Economic rights (such as the right to conduct business) do not fall within the CHR's investigatorial jurisdiction.
2. The CHR has the power to adopt its operational guidelines and rules of procedure and cite for contempt for violations thereof in accordance with the Rules of Court. However, its contempt power only applies to its investigatory functions, not to impose judicial-like orders such as a "cease and desist" order.
3. The Court did not rule on the CHR's power to disburse funds and noted that this matter lies with the appropriate administrative agencies.

Doctrine:

The CHR's authority is limited to investigating all forms of human rights violations involving civil and political rights, not economic rights, and it does not have adjudicatory powers akin to courts of law.

Class Notes:

- Civil Rights: Rights that belong to every citizen and are not connected with the organization or administration of government, such as the rights of property, marriage, equal protection of the laws, freedom of contract, etc.
- Political Rights: Rights that refer to the participation in the establishment or administration of government, such as the right of suffrage and the right to hold public office.
- CHR Powers: Investigate civil and political rights violations, adopt operational guidelines and rules of procedure, provide appropriate legal measures for the protection of human rights, monitor government compliance with international human rights obligations, among others.
- CHR Contempt Powers: Limited to violations of operating procedures during investigations, not punitive measures for non-compliance with orders resembling judicial injunctions.

Historical Background:

The creation of the CHR was influenced by the experiences of human rights violations during martial law declared by then-President Ferdinand Marcos. Its establishment was intended to prevent a repeat of such abuses and to provide an independent body for the protection and promotion of human rights. The constitutional powers of the CHR were crafted to focus on civil and political rights in the wake of past abuses and not to serve as a court or quasi-judicial entity.