

Title: League of Cities of the Philippines (LCP) v. COMELEC

Facts: During the 11th Congress, Congress enacted 33 bills converting 33 municipalities into cities. However, 24 other municipalities failed to have their cityhood bills enacted. In the 12th Congress, Republic Act No. 9009 (RA 9009) was passed, which increased the annual income requirement for municipality conversion into a city from P20 million to P100 million. Joint Resolution No. 29 was introduced to exempt the 24 municipalities from RA 9009, but it was not approved by the Senate before the 12th Congress adjourned. In the 13th Congress, separate cityhood bills were filed for 16 municipalities with a common provision exempting them from RA 9009's income requirement. These cityhood bills lapsed into law from March to July 2007 without being signed by the President.

The League of Cities of the Philippines and several individual cities sought to nullify the 16 cityhood laws, arguing that they violated the equality and uniform income requirements of the constitution prescribed in Section 10, Article X, and that they infringed on the equal protection clause.

Issues:

1. Whether the Cityhood Laws violate Section 10, Article X of the Constitution by exempting respondent municipalities from the requirements of RA 9009.
2. Whether the Cityhood Laws violate the equal protection clause.

Court's Decision: The Court granted the petitions and declared the Cityhood Laws unconstitutional on the grounds that they contravened Section 10, Article X of the Constitution, which prescribes all criteria for the creation of a city to be contained within the Local Government Code, not in a separate legislation. The Cityhood Laws were found to violate the equal protection clause as they unfairly favored certain municipalities over others.

Doctrine:

The Supreme Court of the Philippines established that laws creating cities must adhere to the pre-defined criteria laid out in the Local Government Code and that any exceptions or exemptions should also be explicitly discussed within it, in line with Section 10, Article X of the Constitution. Additionally, the Court reiterated that all laws must comply with the equal protection clause, a principle that safeguards fair and equal treatment of all under the law.

Class Notes:

- Section 10, Article X, and the equal protection clause of the Constitution provide critical

legal measures for ensuring fairness and equity in lawmaking.

- RA 9009 (amending Section 450 of the Local Government Code) exemplifies a legislative update to qualification thresholds for municipalities converting into cities. As such, these modifications are prospective and applicable only to future applications from the date of effectivity.

- The principle of non-retroactivity of laws is a legal standard that prevents the application of new laws to actions, processes, or situations that arose before the enactment of such laws.

- When assessing the constitutionality of legislation, the Supreme Court adopts a strong presumption of constitutionality, assigning the burden of proof to challengers to demonstrate any constitutional violation.

- The equal protection clause demands that all government actions, including the establishment of criteria for city creation, apply uniformly and without discrimination to all similarly situated entities.

Historical Background:

This case takes place within the larger context of Philippine local government autonomy, demarcation of city boundaries, and resource allocation. RA 9009 is part of a series of legislative attempts to refine the process for municipalities becoming cities, aimed at managing the “mad rush” for city conversions, and to safeguard fiscal capacity and territory integrity. The controversy reflects the enduring tension between statutory criteria for cityhood and the legislative power to define such criteria, all framed within an emerging jurisprudence balancing local autonomy with national interests.