

Title: In the Matter of the Inquiry into the 1989 Elections of the Integrated Bar of the Philippines

Facts:

The Integrated Bar of the Philippines (IBP) held its elections for national officers on June 3, 1989, at the Philippine International Convention Center. Attorneys Violeta Drilon and her slate were proclaimed officers. Scheduled to take the oath of office before the Supreme Court en banc, their oath-taking was suspended due to reports of electioneering and overspending. The Supreme Court, exercising its power of supervision over the IBP, resolved to inquire into the veracity of the reports.

Though the process of voting and canvassing was deemed above board, the Court expressed concern over the campaign activities. Allegations included candidates utilizing government planes, vote-buying, extravagant hospitality towards delegates, and intervention by public officials.

A committee was formed, headed by Senior Associate Justice Andres R. Narvasa, to conduct a formal inquiry. Forty-nine witnesses testified regarding campaign expenditures, formation of tickets, and other election irregularities.

Issues:

1. Whether the campaigning activities and techniques used by candidates violated the non-political nature of the IBP as stated in the IBP By-Laws.
2. If such activities could lead to the annulment of the election results.
3. What measures could be adopted to restore integrity and adherence to the principles of the IBP.

Court's Decision:

The Supreme Court found that the activities significantly violated the non-political character of the IBP and made a travesty of the organization's fundamental principles. As such:

1. The 1989 IBP election was annulled.
2. Direct elections by the House of Delegates for the national officers were repealed.
3. The former system of having the IBP President and Executive Vice President elected by the Board of Governors was restored.
4. Various provisions of the IBP By-Laws were amended to emphasize the non-political character and the rotation of executive positions among regions.
5. Special elections for the Board of Governors were ordered to be held.

6. A caretaker board was appointed by the Court to administer IBP affairs pending special elections.

Doctrine:

This case reiterates the doctrine of the strictly non-political character of the Integrated Bar of the Philippines and reinforces the prohibition against lobbying and campaigning in the choice of members of the Board of Governors, officers of the IBP, and other levels of the organization.

Class Notes:

- IBP should be non-political (Art. I, Sec. 4 of the IBP By-Laws).
- Prohibited acts in relation to elections (Art. 1, Sec. 14 of the IBP By-Laws).
- Violations can lead to disqualification or removal from office (Art. VI, Sec. 12(d) of the IBP By-Laws).
- The Supreme Court holds the power to supervise the IBP and amend its By-Laws (Art. XI, Sec. 77 of the IBP By-Laws).
- Lawyers must promote respect for the law and abstain from activities aimed at defiance of the law or at lessening confidence in the legal system (Rule 1.02, Canon 1, Code of Professional Responsibility).

Historical Background:

The anomalies observed in the 1989 IBP elections led the Supreme Court to intervene directly to uphold the integrity of the legal profession. Scrutiny was heightened because the IBP's representation in the Judicial and Bar Council could influence the selection of nominees for judicial appointments. This case demonstrates the Supreme Court's resolve to ensure that the organization lives up to the legal and ethical standards expected of the bar. The decision reflects the Court's commitment to insulating the IBP from political influence and preserving the honor and dignity of the legal practice in the Philippines.