

Title: Metropolitan Manila Development Authority (MMDA) vs. Dante O. Garin

Facts: Dante O. Garin, a lawyer, was issued a Traffic Violation Receipt (TVR) for illegal parking on Gandara Street, Binondo, Manila on August 5, 1995. His driver's license was confiscated by the Metropolitan Manila Development Authority (MMDA) pursuant to the authority granted by Section 5(f) of Republic Act No. 7924 (RA 7924). The TVR stated that Garin must report to the MMDA Traffic Operations Center within 48 hours for "disposition/appropriate action" and that criminal charges would be filed if the license was not redeemed within 30 days. The TVR also served as a temporary driver's license for seven days.

Before the expiration of the TVR's validity, Garin wrote to the MMDA Chairman, Prospero Oreta, requesting the return of his license and expressed his wish to have his case filed in court instead. With no immediate response, Garin filed a complaint with the Regional Trial Court of Parañaque (RTC) on September 12, 1995. He challenged the constitutionality of Section 5(f) of RA 7924, arguing it provided MMDA with unbridled discretion to deprive motorists of their licenses without due process, in violation of the Philippine Constitution. Garin also questioned the validity of MMDA Memorandum Circular No. TT-95-001, alleging it was passed without a quorum.

The MMDA, represented by the Office of the Solicitor General, defended its authority, stating that Section 5(f) powers are legislative and executive, not judicial, hence there was no due process violation. It referred to the MMDA Memorandum Circular No. TT-95-001 dated April 15, 1995, as the implementing rule for Section 5(f). Garin contested the validity of this as well, leading to a trial court decision that declared the circular void ab initio and permanently enjoined MMDA from confiscating driver's licenses without an appropriate prior proceeding.

The MMDA appealed this decision to the Philippine Supreme Court, arguing that a driver's license is a privilege regulated by state police power and that due process is satisfied by procedures allowing appeals from license confiscation.

Issues: The issues identified and discussed by the Supreme Court were:

1. Whether Section 5(f) of RA 7924 constitutionally grants the MMDA the power to confiscate, suspend, or revoke driver's licenses without due process.
2. Whether MMDA Memorandum Circular No. TT-95-001 is valid despite the alleged lack of quorum during its passage.

3. Whether MMDA is vested with police power to enforce and create traffic rules and regulations.

Court's Decision: The Supreme Court dismissed the MMDA's petition, holding:

1. The MMDA does not possess police power under RA 7924 and thus cannot enact or enforce penalties for traffic regulations without legislative or local government delegation.
2. MMDA's Section 5(f) of RA 7924 does not authorize unilateral actions but allows the enforcement of existing traffic laws legislated with proper authority.
3. The MMDA has the duty to enforce traffic laws and regulations, but it must do so within the limits set by its enabling law and in adherence to due process requirements.
4. Recent implementation of Memorandum Circular No. 04, Series of 2004, had made aspects of the case moot but provided guidance for the MMDA's future programs within legal limits.

Doctrine: The case reiterated the doctrine that a driver's license is a privilege subject to the state's regulatory powers, rather than a property right, and that police power belongs primarily to national legislatures and may be delegated but not assumed.

Class Notes:

- A driver's license is not a property right but a privilege subject to regulation.
- Police power is primarily a legislative function and may be delegated to the executive or administrative bodies, but not assumed by agencies without explicit delegation.
- Traffic enforcement must follow due process, and penalties for infractions must be established by laws or regulations with a valid source of authority.
- Administrative bodies, like the MMDA, hold administrative functions and do not possess legislative powers unless expressly granted.

Historical Background: The MMDA was established to oversee and coordinate metro-wide services in Metro Manila, but its legislative history under RA 7924 explicitly limits its powers to administrative rather than legislative functions, differentiating it from its predecessor, the Metro Manila Commission. Despite MMDA's persistent efforts to manage Manila's traffic, its actions must remain within legal constraints as affirmed by the Court's ruling.