

Title: Belgica vs. The Honorable Executive Secretary et al.

Facts:

On January 13, 2014, Greco Antonious Beda B. Belgica filed a petition challenging the constitutional validity of various “lump-sum discretionary funds” in the 2014 General Appropriations Act (GAA), including the Unprogrammed Fund, Contingent Fund, E-Government Fund, and Local Government Support Fund. Belgica argued that these appropriations violated constitutional mandates on non-delegability of legislative power, separation of powers, and the requirements of valid appropriations. He sought a status quo ante order to prevent the use and disbursement of these funds pending the resolution of the petition. The Court had previously, in *Belgica v. Ochoa, Jr.* (2013), ruled against certain appropriations in the 2013 GAA, setting precedent for the present case. Submissions and counterarguments were exchanged, setting the stage for the Supreme Court’s resolution.

Issues:

1. Whether the lump-sum appropriations found in the 2014 GAA violate the doctrine of non-delegability of legislative power.
2. Whether they infringe upon the principle of separation of powers.
3. Whether they comply with constitutional requisites for valid appropriations, including the line-item veto power of the President and relevant provisions of the Administrative Code of 1987.

Court’s Decision:

Procedurally, the Court iterated its power of judicial review and the need for an actual case or controversy, which was met in this case due to the potential misuse of public funds. Substantially, the Court differentiated between permissible lump-sum appropriations and the prohibited types critiqued in the 2013 Belgica case. The Court ruled that the challenged appropriations complied with the constitutional requirements, as each appropriation had a sufficiently specific purpose or was structured to cater to contingencies in a way that preserved executive discretion. These appropriations were found to enhance, rather than diminish, the principle of separation of powers and the mechanism of checks and balances. Therefore, the petition was dismissed for lack of merit.

Doctrine:

The Supreme Court reiterated the doctrine on singular correspondence: an appropriation must be characterized by a singular correspondence, meaning an allocation of a specified amount for a specified purpose, known as a “line-item.” Lump-sum appropriations that fund

