

****Title: Jesus P. Morfe vs. Amelito R. Mutuc, et al.****

****Facts:****

The case revolves around the constitutional challenge against a provision of the Anti-Graft and Corrupt Practices Act (Republic Act No. 3019, approved August 17, 1960), specifically Section 7, which mandates the periodical filing of sworn statements of financial conditions, assets, and liabilities by government officials and employees. Jesus P. Morfe, a judge and the plaintiff, filed an action for declaratory relief in the Court of First Instance of Pangasinan on January 31, 1962, asserting that while the initial submission of such a statement upon assumption of office was reasonable, the subsequent requirement for periodic disclosure was unconstitutional. Morfe contended that it violated the principles of due process, constituted an oppressive exercise of police power, and infringed upon the constitutional rights to privacy and protection against self-incrimination.

The defendants, represented by the then Executive Secretary Amelito R. Mutuc and the Secretary of Justice, argued that the provision was a legitimate exercise of police power aimed at preserving honesty and integrity in public service. They also disputed Morfe's claim that the law impermissibly invaded privacy and infringed upon individual's rights against self-incrimination and unreasonable search and seizure.

The Court of First Instance ruled in favor of Morfe, declaring the periodic filing requirement unconstitutional. The defendants appealed the decision to the Supreme Court.

****Issues:****

1. Whether the periodical submission of sworn statements of assets and liabilities as mandated by Section 7 of the Anti-Graft and Corrupt Practices Act violates the due process clause due to being an oppressive exercise of police power.
2. Whether the requirement infringes upon the constitutional right to privacy.
3. Whether the provision violates the protections against unreasonable search and seizure and self-incrimination.

****Court's Decision:****

The Philippine Supreme Court reversed the lower court's decision, upholding the constitutionality of the periodical filing requirement. The Court reasoned as follows:

1. ****Due Process and Police Power:**** The Court found no evidence to rebut the presumption

of validity of the law. It emphasized that the provision represents a valid exercise of police power aimed at promoting honesty and integrity in public service, asserting that any restriction on liberty or property in this context is permissible as long as due process is observed.

2. **Right to Privacy:** The Court acknowledged the importance of the constitutional right to privacy but concluded that the statutory requirement for periodic disclosure by public officials does not infringe upon this right. It recognized the significant public interest in maintaining the integrity of public service which justifies this disclosure.

3. **Unreasonable Search and Seizure and Self-Incrimination:** The Court found that the provision did not constitute an unreasonable search and seizure, nor did it compel self-incrimination. It described the requirement as a reasonable regulatory measure not tantamount to a coercive invasion of privacy or self-incrimination, especially considering that the disclosed information pertained directly to public functions.

Doctrine:

The decision established or reiterated several doctrines:

- The presumption of validity of legislative enactments in the absence of clear and convincing evidence to the contrary.
- The broad scope of the police power of the state, acknowledging that it may encompass measures to ensure honesty and integrity among public officials as a legitimate exercise aimed at promoting the general welfare.
- The distinction between an intrusion into private affairs that constitutes a violation of the right to privacy and necessary regulatory disclosures related to public functions, noting that the latter does not automatically violate privacy rights.

Class Notes:

- **Police Power:** The inherent and plenary power in the state enabling it to prescribe regulations to promote health, morals, education, good order, safety, or the general welfare of the people.
- **Due Process:** Requires that deprivation of life, liberty, or property must be preceded by notice and opportunity for hearing appropriate to the nature of the case.
- **Right to Privacy:** Recognized independently in the Constitution but not absolute against necessary regulatory measures related to public functions.
- **Protection against Unreasonable Search and Seizure:** Safeguards the sanctity of

domicile and privacy of communication; does not preclude the state from mandating disclosures directly related to public service functions.

- ****Self-Incrimination Clause:**** Protects individuals from being compelled to testify against themselves; does not necessarily invalidate regulatory requirements for disclosure of financial status by public officials.

****Historical Background:****

The case provides insight into the judicial balancing act between upholding constitutional rights and the necessity of implementing measures aimed at curbing corruption and ensuring the integrity of public service. Set against the backdrop of efforts to combat graft and corruption in the Philippines during the post-war era, the Supreme Court's decision highlights a crucial aspect of governance in the Philippine legal system: the commitment to maintaining a standard of honesty and integrity among public servants as a cornerstone of public trust.