

****Title:** Renato V. Peralta vs. Philippine Postal Corporation (PhilPost) et al.**

****Facts:****

The Philippine Postal Corporation (PhilPost) issued a stamp on May 10, 2014, commemorating the Centennial Celebration of Iglesia ni Cristo (INC). It featured a photo of INC's founder, Felix Y. Manalo, the Central Temple, and the INC centennial logo. Renato V. Peralta filed a complaint for injunction with the Regional Trial Court (RTC) of Manila on June 16, 2014, challenging the constitutionality of the printing, issuance, and distribution of these stamps, alleging the use of public funds and violation of the constitutional principle of the separation of Church and State.

After service of summons and a hearing, the RTC denied the Temporary Restraining Order (TRO) application. PhilPost and its Board of Directors defended the issuance, stating that the costs were borne by INC per a Memorandum of Agreement (MOA) dated May 7, 2014. They argued the stamps were part of PhilPost's philatelic products, promoting tourism without violating any constitutional provision.

The RTC, in its Order dated July 25, 2014, denied Peralta's application for a preliminary injunction and dismissed the action. Peralta appealed to the Court of Appeals (CA), which upheld the RTC's decision. Displeased, Peralta filed a motion for reconsideration, which the CA denied. Subsequently, Peralta filed a petition for review with the Supreme Court.

****Issues:****

1. Whether the printing, issuance, and distribution of the INC Centennial stamps violated the constitutional principle of the separation of Church and State.
2. Whether public funds were unlawfully used in the printing and issuance of the INC commemorative stamps.

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

The Supreme Court ruled that the petition lacked merit. It emphasized that there must be a clear and actual case of controversy, the constitutionality of an act must be challenged by the proper party with personal and substantial interest, must be raised at the earliest opportunity, and must be the *lis mota* of the case.

In addressing the main issue, the Court found the printing and issuance of the INC Centennial stamps did not violate the constitutional prohibition against the establishment of religion. The Court emphasized the principle of "benevolent neutrality" concerning freedom of religion, allowing for a broad exercise of religious freedom without infringing the non-

establishment clause. The Court concluded that the stamps were released within the secular purpose of recognizing a historical Filipino institution, not endorsing a specific religion, and were funded by INC, not public funds.

****Doctrine:****

The principle of “benevolent neutrality” towards religious freedom permits the broadest exercise of religious expression without infringing on the non-establishment clause, provided the actions have a primarily secular purpose.

****Class Notes:****

- The power of judicial review is subject to limitations, including actual case or controversy, proper party, early challenge, and constitutional question being the *lis mota*.
- The non-establishment of religion clause allows for “benevolent neutrality” to accommodate religious practices within constitutional limits.
- Public funds or property cannot be used for the benefit or support of any religious sect or institution, except under specific conditions detailed in the Constitution.

****Historical Background:****

This case occurred within the broader context of ongoing debates in the Philippines about the separation of Church and State, a principle firmly embedded in the 1987 Constitution due to historical experiences with religious interference in state affairs. The Supreme Court’s decision in this case reflects its cautious approach to balancing religious freedom with the secular nature of the State, reaffirming its commitment to benevolent neutrality towards religious exercises.