

****Title:**** Angara vs. Electoral Commission

****Facts:****

The case revolves around Jose A. Angara (petitioner) against the Electoral Commission and Pedro Ynsua among others, as respondents. The critical events unfolded as follows:

1. During the elections on September 17, 1935, Jose A. Angara and Pedro Ynsua, among others, ran for a National Assembly position in Tayabas province.
2. On October 7, 1935, Angara was proclaimed the winner by the provincial board of canvassers.
3. Angara took his oath of office on November 15, 1935.
4. On December 3, 1935, the National Assembly adopted a resolution (Resolution No. 8) confirming the election of those members against whom no protest had been filed.
5. Ynsua filed a "Motion of Protest" against Angara's election with the Electoral Commission on December 8, 1935 - after the passage of Resolution No. 8.
6. The Electoral Commission, having set December 9, 1935, as the deadline for filing protests, proceeded to entertain the protest against Angara.
7. Angara, in response, filed a "Motion to Dismiss the Protest" with the Electoral Commission on December 20, 1935, contending primarily that the National Assembly's Resolution No. 8 meant that the period for filing protests had ended.
8. The Electoral Commission, on January 23, 1936, denied Angara's "Motion to Dismiss," asserting its jurisdiction to proceed with the election protest regardless of the National Assembly's resolution.

Angara then filed with the Supreme Court an original action for the issuance of a writ of prohibition to restrain the Electoral Commission from pursuing the protest filed by Ynsua.

****Issues:****

1. Does the Supreme Court have jurisdiction over the Electoral Commission and the subject matter of the controversy?
2. Did the Electoral Commission act without or in excess of its jurisdiction in taking cognizance of Ynsua's protest despite the National Assembly's confirmation of Angara's election?

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

1. **Jurisdiction:** The Supreme Court affirmed its jurisdiction to review the Electoral Commission's actions, delineating the constitutional mechanism designed for such purpose and asserting its role in defining constitutional boundaries.
2. **Electoral Commission's Jurisdiction:** The Court ruled in favor of the Electoral Commission, stating it acted within its constitutional prerogative in taking cognizance of the election protest. It elucidated that the power to resolve election contests vested in the Electoral Commission was comprehensive and exclusive, consequently implying the power to determine procedural aspects such as deadlines for filing protests.

Doctrine:

The case established the doctrine of judicial review in the Philippines, specifically the power of the Supreme Court to determine the limits of authority of governmental branches or agencies under the Constitution. It also clarified the jurisdictional reach and autonomy of the Electoral Commission, setting a precedent for the exclusive and independent adjudication of legislative election contests.

Class Notes:

- **Judicial Review:** The authority of the judiciary, specifically the Supreme Court, to interpret the Constitution and to declare any act of government that contravenes the constitution void.
- **Separation of Powers:** The division of governmental authority among the Executive, Legislative, and Judicial branches to prevent abuse of power.
- **Constitutional Mechanism:** The system of checks and balances among branches of government, which includes the judicial review power of the Supreme Court.
- **Electoral Commission:** A constitutional creation with a specific function and authority to resolve all contests relating to the election, returns, and qualifications of members of the National Assembly.
- **Legislative Adjudication of Election Contests:** Prior to the current Constitution, the power to decide election contests for legislative members resided with the legislature itself—a practice modified by the establishment of the Electoral Commission.

Historical Background:

The establishment of the Electoral Commission represented a pivotal shift from legislative to a specialized judicial mechanism for resolving election disputes for legislative seats. It was a reaction against the practices of legislative partisanship, aiming to ensure a non-partisan

resolution of electoral contests—a principle that has since been integral to fostering judicial independence and maintaining checks and balances within the Philippine government structure.