

Title:

Guevara vs. Commission on Elections (1957)

Facts:

Jose L. Guevara published an article entitled “Ballot Boxes Contract Hit” in the Sunday Times on June 2, 1957. This publication triggered the Commission on Elections (COMELEC) to summon Guevara to show cause why he should not be punished for contempt. The content was allegedly contemptuous, potentially influencing the COMELEC during its investigation and determination of a controversy involving the awarding of contracts for the manufacture of 34,000 ballot boxes—a matter then pending before the commission. Guevara responded with a motion to quash, challenging COMELEC’s jurisdiction and the applicability of contempt powers to the case.

The root issue involved the awarding of contracts to three companies (National Shipyards & Steel Corporation, Acme Steel Mfg. Co., Inc., and Asiatic Steel Mfg. Co., Inc.) for ballot box production. After a series of reconsideration petitions filed by Acme, which were subsequently denied, the publication by Guevara followed. The debate culminated in a legal battle questioning the jurisdiction and authority of the COMELEC to conduct contempt proceedings against Guevara due to the article. After internal deliberations, COMELEC referred the jurisdictional challenge to the Supreme Court.

Issues:

1. Whether the COMELEC has the power and jurisdiction to conduct contempt proceedings and impose disciplinary penalties for publications influencing its adjudicative process.
2. Whether the publication in question qualifies as contemptuous, considering the timing and the administrative function of purchasing ballot boxes by the COMELEC.

Court’s Decision:

The Supreme Court granted Guevara’s petition, ruling that the COMELEC, being an administrative body exercising primarily administrative (not judicial) functions, does not possess the judicial power to punish for contempt in relation to the publication in question. The court distinguished between the administrative function of preparing for elections, including purchasing supplies like ballot boxes, and judicial or quasi-judicial functions that could warrant exercising contempt powers.

1. On the jurisdiction to punish for contempt, the court asserted that such a power is inherently judicial, and while the COMELEC can perform quasi-judicial functions, punishing

for contempt for actions relating to its administrative functions (e.g., the procurement process for ballot boxes) exceeds its constitutional powers.

2. Regarding the publication's classification as contemptuous, the decision hinged more on the lack of jurisdiction. The court didn't delve deeper as the primary jurisdictional issue was resolved in favor of Guevara.

Doctrine:

The power to punish for contempt is inherently judicial and essential for court order, judgment enforcement, and justice administration. Administrative bodies may exercise such power only in narrow contexts related to their ability to conduct hearings and elicit testimony. In essence, an administrative body like the COMELEC cannot exercise this power in matters related to its administrative functions.

Class Notes:

1. **Jurisdiction for Contempt**: Reserved for judicial entities and related to their core functions of preserving order, enforcement of mandates, and administration of justice.
2. **Administrative vs. Judicial Functions**: Administrative functions involve preparatory and procedural aspects