

Title: Teodosio Lansang v. Brigadier-General Eduardo M. Garcia, et al.

Facts: On August 21, 1971, during the Liberal Party's public meeting at Plaza Miranda for their candidates in the upcoming general elections, two hand grenades were thrown, resulting in eight deaths and numerous injuries, including several candidates. Shortly after, President Ferdinand E. Marcos announced the suspension of the privilege of the writ of habeas corpus through Proclamation No. 889, citing lawless elements aiming to overthrow the government with support from a foreign power. This led to the detention of numerous individuals believed to be involved in insurrection or rebellion. Among those detained were Teodosio Lansang, Rodolfo del Rosario, and Bayani Alcala, whose petition for habeas corpus was filed on August 24, 1971, marking the procedural start of a series of similar petitions, all challenging the validity of the proclamation and their detention. These cases were consolidated by the Supreme Court for a joint decision.

Issues:

1. Whether the suspension of the privilege of the writ of habeas corpus through Proclamation No. 889, as amended, was constitutional.
2. Whether the detainees were rightfully covered by the said proclamation.
3. Whether the Court has the authority to inquire into the factual bases for the President's issuance of Proclamation No. 889 to determine its constitutional sufficiency.

Court's Decision:

1. The Court held that the President did not act arbitrarily in issuing Proclamation No. 889, as amended, and thus, it was not unconstitutional.
2. The Supreme Court further held that the detainees, including Teodosio Lansang and others, were lawfully detained under the proclamation because they were believed to be part of or supporting the rebellion.
3. The Court unanimously agreed that it had the authority to inquire into the existence of the factual bases for the issuance of Proclamation No. 889 as amended and thus determine the constitutional sufficiency of such bases.

Doctrine: The privilege of the writ of habeas corpus may be suspended in cases of invasion, insurrection, or rebellion when public safety requires it, as long as the suspension and the detention of individuals are not arbitrary and have a factual basis in accordance with the Constitution.

Class Notes:

- The privilege of the writ of habeas corpus, under Article III, Section 15 of the Philippine Constitution, can be suspended in cases of invasion or rebellion when the public safety requires it.
- The President of the Philippines has the power to suspend the privilege of the writ of habeas corpus under Article VII, Section 18 of the Constitution, but such power is subject to judicial review to ensure it is not exercised arbitrarily.
- The Supreme Court has the authority to inquire into the factual bases of the President's decision to suspend the privilege of the writ to determine its constitutional sufficiency.

Historical Background: The suspension of the privilege of the writ of habeas corpus in 1971 was a significant event that tested the limits of executive power and civil liberties in the Philippines. It highlighted the tension between national security and individual rights and freedoms during a period of political unrest. The Supreme Court's decision in this case set an important precedent regarding the checks and balances between the executive and judicial branches of government, particularly in the context of emergency powers and the suspension of civil liberties.