

****Title**:** Agcaoili Jr. et al. v. Hon. Representative Rodolfo C. Fariñas et al.

****Facts**:**

The case originated from House Resolution No. 882, introduced by Representative Rodolfo C. Fariñas and others, directing an inquiry into the use of Ilocos Norte's share from excise taxes on cigarettes. This inquiry particularly focused on the purchase of vehicles by the Provincial Government of Ilocos Norte, which Fariñas alleged violated Republic Act (R.A.) No. 7171 and other pertinent laws. The investigation targeted several employees of the Provincial Government of Ilocos Norte, collectively known as "Ilocos 6," and Maria Imelda "Imee" R. Marcos, the Governor of Ilocos Norte.

After failing to attend the initial hearing and subsequent hearings despite subpoenas and show cause orders, the "Ilocos 6" were detained by order of the House Committee on Good Government and Public Accountability for contempt. This prompted the filing of a Habeas Corpus petition before the Court of Appeals (CA), which later evolved into an Omnibus Petition before the Supreme Court seeking relief through Habeas Corpus, prohibition under Rule 65, and a Writ of Amparo.

****Issues**:**

1. Whether the petition was rendered moot by the subsequent release of the "Ilocos 6" from detention.
2. Whether the Supreme Court can assume jurisdiction over the Habeas Corpus petition pending before the CA.
3. Whether the legislative inquiry can be enjoined by a writ of prohibition.
4. Whether the petition sufficiently states a cause of action for the issuance of a Writ of Amparo.

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

The Supreme Court dismissed the Omnibus Petition. It ruled that the petition for Habeas Corpus became moot upon the release of the "Ilocos 6." The Court also explained that it could not assume jurisdiction over the Habeas Corpus petition initially filed with the CA. Regarding the petition for prohibition, the Court found no justification to issue a writ of prohibition as the congressional inquiry did not violate the Constitution, nor was it attended by grave abuse of discretion. Lastly, the Court concluded that the petition failed to establish a basis for the issuance of a Writ of Amparo, as it did not concern extralegal killings or enforced disappearances, or threats thereof, which the Writ of Amparo is designed to address.

****Doctrine**:**

- The mootness of a Habeas Corpus petition upon the release of detained individuals.
- The limitations on the Supreme Court's power to assume jurisdiction over cases pending in lower courts.
- The criteria and limitations for issuing a writ of prohibition against legislative actions.
- The specific applicability of the Writ of Amparo to cases of extralegal killings, enforced disappearances, or threats thereof.

****Class Notes**:**

- ****Habeas Corpus****: A remedy for those unlawfully detained, which becomes moot upon the detainee's release.
- ****Writ of Prohibition****: Cannot be used to impede legislative actions unless those actions are proven to violate the Constitution or exceed jurisdiction, displaying grave abuse of discretion.
- ****Writ of Amparo****: Specifically targets cases of extralegal killings, enforced disappearances, and threats thereof, requiring substantial evidence of threat or violation of the right to life, liberty, and security.
- ****Separation of Powers****: Judicial review over legislative and executive actions is limited to ensuring there is no grave abuse of discretion amounting to lack or excess of jurisdiction.

****Historical Background**:**

The case underscores the complex balance between the powers of the legislative branch to conduct inquiries in aid of legislation and the judicial branch's role in ensuring the protection of constitutional rights. It highlights the challenges and limitations faced by individuals in contesting the conduct of legislative inquiries, especially when it involves possible abuses of power and the detention of individuals refusing to testify or deemed uncooperative.