

Title: Iglesia Ni Cristo vs. The Honorable Court of Appeals, et al.

Facts:

The petitioner, Iglesia ni Cristo (INC), a recognized religious organization, has been airing its television program titled “Ang Iglesia ni Cristo” on Channels 2 and 13. The program aims to propagate the religious beliefs, doctrines, and practices of INC, often comparing these to other religions. In the months of September, October, and November 1992, INC submitted VTR tapes of its TV program Series Nos. 116, 119, 121, and 128 for review to the respondent Board of Review for Motion Pictures and Television (BRMPT), which subsequently rated the series as “X” or not suitable for public viewing. The Board justified its decision by stating that the episodes attacked other religions, which is prohibited by law.

INC responded by taking two actions: appealing to the Office of the President regarding the classification of Series No. 128, resulting in a reversal of the Board’s decision, and filing a civil case (Civil Case No. Q-92-14280) against the Board on December 14, 1992, at the RTC of Quezon City. INC argued that the Board had acted beyond its jurisdiction or with grave abuse of discretion, citing the freedom of religious exercise and expression. The trial progressed through hearings, a writ of preliminary injunction on petitioner’s bond, pre-trial briefs, attempts at an amicable settlement, and submission of memoranda, ending with the trial court judging in favor of INC but with stipulations directing INC to refrain from offensive attacks against other religions in its program. However, upon INC’s motion for reconsideration, the court ordered the deletion of the directive to refrain from attacking other religions and prohibited the Board from requiring INC to submit VTR tapes of its program for preview.

The Board appealed the decision to the Court of Appeals, which on March 5, 1995, reversed the trial court’s decision, holding the Board has jurisdiction to review and power to deny permits for the exhibition of the INC’s TV program due to its offensive attacks against another religion and its indecent contents contrary to law and good customs.

Issues:

1. Whether the Court of Appeals erred in ruling that the INC’s TV program is not constitutionally protected as a form of religious exercise and expression.
2. Whether the Court of Appeals erred in not recognizing the program as an exercise of religious freedom, subject only to the State’s police power in cases of clear and present danger.
3. Whether the Court of Appeals erred in affirming the MTRCB’s power to censor the INC’s

religious programs.

4. Whether the Court of Appeals erred in ruling that the program, being purely religious, is indecent and contrary to law and good customs.

Court's Decision:

The Supreme Court upheld the jurisdiction of the MTRCB to review INC's TV program under P.D. No. 1986 but also clarified that religious freedom is a preferred right that must be protected. The Court admitted that religious speech may be regulated by the State to prevent imminent and substantial threats to public welfare but clarified that the actions of the respondent Board to prohibit the airing of INC's programs for their attacks against other religions suppressed freedom of speech and interfered with INC's right to religious exercise. The Court found that the MTRCB's and the appellate court's decisions lacked sufficient justification for categorizing the episodes as attacks against another religion and deemed the episodes as falling within the protected bounds of religious expression. Consequently, the Supreme Court reversed the decision of the respondent Court of Appeals insofar as it sustained the MTRCB's rating of the INC's TV Program Series as "X."

Doctrine:

The exercise of religious freedom, including religious speech and propagation, is protected under the Constitution and cannot be subjected to prior restraint unless there exists a clear and present danger of substantive evil that the State is duty-bound to prevent. The State must remain neutral in matters of religious differences, and the remedy against bad theology is more theology, not suppression.

Class Notes:

- Religious freedom is considered a preferred right that is given ample protection by the Constitution, distinguishing between absolute freedom to believe and regulated freedom to act on beliefs.
- The exercise of religious beliefs can be subject to the State's regulatory powers only when such exercise poses a clear and present danger to public welfare.
- Administrative bodies, like the MTRCB, possess the authority to review and classify television programs, including religious programs, under P.D. No. 1986.
- Prior restraint on speech, especially religious speech, carries a presumption of invalidity; the State bears the burden to justify such restraint by demonstrating a clear and present danger of a substantive evil it seeks to prevent.

Historical Background:

The case highlights the tension between the State's regulatory authority over broadcast media and the constitutional guarantee of freedom of religion and expression. It also reflects the continuing evolution of legal interpretations on the extent of regulatory authority that the State can exercise over religious expressions in public broadcasts, underscoring the paramount importance of protecting religious liberty and free speech in a democratic society.