

Title: **Velarde v. Social Justice Society: A Case on the Endorsement of Candidates by Religious Leaders**

**Facts:**

The case originated from a Petition for Declaratory Relief filed by the Social Justice Society (SJS) against Brother Mariano “Mike” Z. Velarde and others before the Regional Trial Court (RTC) of Manila. SJS sought a judicial interpretation of the constitutional provisions on the separation of church and state, specifically questioning whether the acts of religious leaders endorsing political candidates or urging their members to vote for specific individuals were constitutional.

The respondents, including Velarde, filed motions to dismiss, arguing the petition lacked a cause of action and there was no justiciable controversy. The RTC denied these motions. Despite requests for reconsideration and compliance with subsequent orders for memoranda submission, the RTC issued a decision without the usual dispositive portion, merely opining on the constitutional issue raised.

Velarde, discontent with the RTC’s approach, specifically its failure to provide a clear ruling and reasoning as mandated by law, escalated the matter to the Supreme Court via a Petition for Review under Rule 45 of the Rules of Court.

**Issues:**

The Supreme Court was tasked to resolve whether:

1. The RTC’s decision conformed to the constitutional and legal requirements regarding form and substance.
2. A justiciable controversy existed warranting the declaratory relief sought by SJS.
3. SJS had the legal standing to file the petition.
4. The petition stated a cause of action.
5. The acts of religious leaders endorsing candidates for political office were unconstitutional.

**Court’s Decision:**

The Supreme Court granted Velarde’s petition, declaring the RTC’s decision void for its failure to comply with constitutional and legal requirements on decision-making. Specifically, the Court noted the absence of a statement of facts and a dispositive portion in the RTC’s decision, which are crucial elements for a valid judicial ruling. The Court emphasized that decisions must clearly and distinctly state the facts and the law on which

they are based, as mandated by the Constitution.

The Court further discussed the procedural and substantive issues surrounding actions for declaratory relief, reiterating the essentials such as the existence of a justiciable controversy and the legal standing of the petitioner. The Court found that SJS's petition failed to demonstrate a specific legal right threatened by the respondents' actions and thus did not meet the criteria for a justiciable controversy or a cause of action.

On the substantive question of whether religious leaders can endorse candidates, the Court refrained from issuing a definitive ruling due to the procedural inadequacies of the case presented, including the lack of factual basis from the lower court's proceedings.

**\*\*Doctrine:\*\***

This case reiterates the doctrines on the fundamental requirements for judicial decisions, emphasizing the necessity for decisions to contain explicit statements of fact and law, as well as dispositive portions that conclusively resolve the issues presented. It also highlights the prerequisites for filing a petition for declaratory relief, including the existence of a justiciable controversy and the petitioner's legal standing.

**\*\*Class Notes:\*\***

- Judicial decisions must explicitly state the facts and the law on which they are based and include a dispositive portion that resolves the issues.
- For declaratory relief actions, there must be a justiciable controversy, and the petitioner must have a legal standing and a cause of action.
- The separation of church and state is a critical constitutional principle, but its application in specific instances requires a clear factual basis to ascertain the presence of any constitutional violation.

**\*\*Historical Background:\*\***

The case underscores the delicate balance the judiciary must maintain in interpreting the constitutional separation of church and state, especially in the context of evolving political dynamics and the influential role of religious leaders in public life. It emphasizes the judiciary's role in strictly adhering to procedural and substantive legal standards to ensure fair and just resolution of disputes involving significant constitutional questions.