

Title: Regina Ongsiako Reyes v. House of Representatives Electoral Tribunal

Facts:

Regina Ongsiako Reyes (Petitioner) contested the constitutionality of certain provisions in the 2015 Revised Rules of the House of Representatives Electoral Tribunal (HRET). The questioning arose from two pending quo warranto cases against her before the HRET, specifically Case No. 13-036 and Case No. 13-037. The challenged provisions concerned the quorum requirement of including at least one Justice of the Supreme Court, requisites for being considered a Member of the House of Representatives, and the expanded jurisdiction purportedly given to the Commission on Elections (COMELEC) under the new rules. The petition was defended by the HRET, which maintained its rule-making power while dismissing the claim of unconstitutionality.

Issues:

1. Whether Rule 6(a) requiring at least one Justice of the Supreme Court to constitute a quorum is constitutional.
2. Whether Rules 15, 17, and 18 unconstitutionally expanded the jurisdiction of the COMELEC.
3. Whether these provisions created ambiguity and violated the equal protection clause.

Court's Decision:

The Supreme Court dismissed the petition, finding no merit in the challenges.

- ****On the Quorum Requirement (Rule 6(a))****: The Court upheld the constitutionality of requiring the presence of at least one Supreme Court Justice to constitute a quorum in the HRET as compliant with the intention of the 1987 Constitution framers, aimed at ensuring impartiality and a judicial temper in the electoral tribunal's deliberations.

- ****On Expanding COMELEC's Jurisdiction****: The court ruled that the HRET did not expand the jurisdiction of the COMELEC, stating that HRET retained its constitutional mandate as the sole judge of election-related contests concerning House members. The requisites for a member of the House of Representatives (valid proclamation, proper oath, and assumption of office) were deemed within the HRET's purview to specify.

Doctrines:

- The necessity of including Supreme Court Justices in the HRET to ensure impartiality and uphold the judicial nature of the tribunal.
- Affirmation of the HRET's constitutional mandate as the sole judge of election disputes

concerning House members.

Class Notes:

- The equal protection clause allows for reasonable classification if based on substantial differences relevant to a legitimate government objective.
- The HRET's rule-making power is derived from its constitutional mandate, which allows it to promulgate rules necessary for its functions, including quorum requirements and procedural rules.
- The presence of the judiciary in the HRET (Supreme Court Justices) is meant to temper the political aspects of electoral disputes with judicial reasoning.

Historical Background

This decision underscores the unique mechanism of the Philippines' electoral dispute resolution through the HRET — a body that combines judicial and legislative elements to address electoral contests. It reflects the constitutional intention to have a balanced and impartial tribunal, mindful of the political nature of such disputes but anchored on legal principles.