

Title: Regina Ongsiako Reyes vs. House of Representatives Electoral Tribunal (HRET)

Facts:

Regina Ongsiako Reyes, herein petitioner, is involved in two pending quo warranto cases before the House of Representatives Electoral Tribunal (HRET), identified as Case No. 13-036 and Case No. 13-037. The HRET published the 2015 Revised Rules on November 1, 2015, which became a point of contention for Reyes. She challenged several provisions of the revised rules for being unconstitutional, particularly those about the quorum requirement involving Supreme Court justices, the constitution of a quorum, and the criteria for being considered a member of the House of Representatives. Reyes argues that these rules provide the justices unwarranted veto powers, violate the equal protection clause by making justices indispensable for a quorum, and unconstitutionally expand the jurisdiction of the Commission on Elections (COMELEC).

The HRET, through its Secretary, defended its rule-making power stating it was within its purview to govern its proceedings. The HRET clarified that the presence of at least one justice, as required for a quorum, maintains judicial balance and does not confer undue authority to justices. Moreover, the HRET asserted its jurisdiction over the matter, stating that the rules on membership qualifications do not expand COMELEC's jurisdiction.

The petitioner's motion was initially brought before the HRET, and upon dissatisfaction with the application of the 2015 HRET rules to her cases, she brought her motion before the Supreme Court of the Philippines, seeking a certiorari against the HRET's revised rules.

Issues:

1. Whether Rule 6(a) of the 2015 HRET Rules, requiring the presence of at least one Justice to constitute a quorum, violates the equal protection clause of the 1987 Constitution.
2. Whether Rule 6(b) and (c), related to actions of the Executive Committee in the absence of a quorum, assign undue veto power to Justices and violate democratic principles.
3. Whether Rule 15, paragraph 2, in relation to Rules 17 and 18, unconstitutionally expands the jurisdiction of the COMELEC concerning the qualifications for being considered a member of the House of Representatives and the period for filing electoral protests.

Court's Decision:

The Supreme Court of the Philippines dismissed the petition, holding that:

1. Rule 6(a) is constitutional and does not violate the equal protection clause. It reasoned that this rule ensures judicial balance in the tribunal by requiring the presence of both judicial and legislative members to constitute a quorum. The presence of at least one justice alongside legislative members is to maintain impartiality and does not unduly favor justices over legislators.

2. The Court found no merit in the claims against Rule 6(b) and (c). The actions taken by the Executive Committee in the absence of a quorum are subject to the confirmation of the tribunal when a quorum is present, hence safeguarding against arbitrary decisions.

3. The rules concerning the qualifications for being a member did not unconstitutionally expand COMELEC's jurisdiction. The Court clarified that the HRET remains the sole judge of all contests relating to the election, returns, and qualifications of Members of the House of Representatives. Amendments to Rule 17 and 18 clarified the filing period for electoral protests, thereby negating the petitioner's concerns over ambiguity.

Doctrine:

The case reiterates that the House of Representatives Electoral Tribunal has the authority to promulgate its rules governing its proceedings. It established that requiring the presence of Supreme Court Justices as part of the quorum does not violate the equal protection clause but ensures the tribunal's impartiality and judicial balance.

Class Notes:

- **Quorum Requirement**: Ensuring the presence of both judicial and legislative members to constitute a quorum ensures impartiality and is constitutionally sound.
- **Equal Protection Clause**: The need for legislative and judicial members for a quorum does not violate the equal protection clause provided the classification is reasonable and not arbitrary.
- **Rule-making Authority**: Electoral tribunals have the authority to promulgate their rules of procedure, ensuring their independence and functionality.

Historical Background:

This case dives into the core of the constitutional design for the adjudication of electoral disputes involving members of the House of Representatives in the Philippines. Considering the historical context, the setup of the HRET is a measure to insulate electoral contests from

partisan politics, balancing members from the judiciary and legislature to ensure fairness and impartiality. This design, embedded in the historical drafting of the Philippine Constitution, seeks to separate electoral adjudication from the potential biases and influences of legislative majorities, illustrating the constitutional commitment to democratic principles and judicial independence within electoral contexts.