

****Title:** Atienza v. Commission on Elections**

****Facts:****

1. ****Initial Dispute (2005):**** On July 5, 2005, Franklin M. Drilon, then-president of the Liberal Party (LP), announced the withdrawal of the party's support for President Gloria Macapagal-Arroyo's administration. However, Jose L. Atienza, Jr., LP Chairman, along with other party members, denounced Drilon's announcement claiming it was done without proper consultation.
2. ****Conference and Elections (2006):**** On March 2, 2006, Atienza hosted a party conference supposedly to discuss local autonomy and party matters. Instead, the assembly declared all LP positions vacant and elected new officers with Atienza as president. Drilon contested this move before the COMELEC, arguing the election was illegal as it did not comply with the party's National Executive Council (NECO) and National Political Council (NAPOLCO) protocols. Drilon also cited that the positions had fixed terms that would end on November 30, 2007.
3. ****COMELEC Ruling (2006):**** On October 13, 2006, COMELEC partially granted Drilon's petition, annulling the March 2 elections, deeming them invalid under the LP's Salonga Constitution. However, since the amended LP Constitution fixing terms was not properly ratified, Drilon's term was extended in a holdover capacity until new elections could be held.
4. ****Supreme Court Resolution (2007):**** The Supreme Court validated COMELEC's jurisdiction over the dispute and confirmed that the Salonga Constitution had been validly amended, solidifying Drilon's term till November 30, 2007.
5. ****New Elections (2007):**** LP held a NECO meeting before Drilon's term ended, electing Manuel A. Roxas II as LP president. Atienza supporters raised concerns about the NECO's valid composition.
6. ****New Petition (2008):**** On January 11, 2008, Atienza and co-petitioners sought an injunction from COMELEC to prevent Roxas from assuming the presidency, questioning the legitimacy of the NECO meeting and their membership status.
7. ****COMELEC Ruling (2009):**** On June 18, 2009, the COMELEC dismissed Atienza's petition, declaring the NECO properly constituted and the election of Roxas as valid. It treated the expulsion of petitioners from LP as an internal party matter beyond COMELEC's

jurisdiction.

8. **Supreme Court Petition (2009):** Without seeking reconsideration from COMELEC, Atienza and co-petitioners filed a certiorari petition with the Supreme Court under Rule 65.

Issues:

1. **Indispensable Party:** Whether LP is an indispensable party to this case.
2. **Standing:** Whether the petitioners, as ousted LP members, have the requisite legal standing to contest Roxas's election.
3. **COMELEC's Discretion:** Whether COMELEC gravely abused its discretion upholding Roxas's election.
4. **Due Process:** Whether COMELEC erred by not addressing the expulsion of Atienza, et al.
5. **Constitutional Rights:** Whether petitioners' expulsion violated their constitutional right to due process.

Court's Decision:

1. **Indispensable Party:** The Court held that LP was not an indispensable party as no wrong was imputed to LP by Atienza et al.; relief was sought specifically against Roxas, et al.
2. **Standing:** The Court determined that Atienza, et al. had legal standing. They were real parties-in-interest as they alleged disenfranchisement which, if proven, would affect their status and rights within the party.
3. **COMELEC's Discretion:** The Court ruled that the COMELEC did not abuse its discretion in upholding the election. It found the NECO properly convened per the amended LP Constitution, with dynamic membership changes explained and justified by the results of relevant elections and statutes.
4. **Expulsion and Leadership:** The issue of expulsion was a separate internal matter. COMELEC's jurisdiction does not typically extend to such intra-party issues unless they directly affect its functions. The election was held valid independently of the party membership disputes.
5. **Due Process:** The Court clarified that the due process clause primarily limits state actions and not private entities. Thus, LP's internal disciplinary procedures did not entitle

petitioners to the requirements of administrative due process that govern government agencies.

****Doctrine:****

1. ****Political Party Autonomy:**** Political parties are generally autonomous in conducting internal affairs unless those issues directly impact election process regulations.
2. ****Legal Standing:**** The real party-in-interest rule recognises the eligibility of individuals directly affected by party actions to challenge such actions legally.
3. ****Article III Limitations:**** Due process rights under the Constitution restrict state actions and do not apply to internal decisions of private entities like political parties.

****Class Notes:****

- ****Real Party-in-Interest (Rule 3, Sec. 2 of the Rules of Court):**** Legal standing based on those who stand to benefit or be injured by the judgment.
- ****COMELEC Jurisdiction (Sec. 2, Art. IX-C of the Constitution):**** Includes determining legitimate party officers when resolving leadership disputes incidental to party registration.
- ****Due Process (Article III, Constitution):**** Protects from arbitrary government actions, not applicable in private party disputes.
- ****Political Party Membership:**** Subject to internal governance and not generally subject to state regulatory frameworks, barring impact on broader electoral processes.

****Historical Background:****

This case unfolds against a backdrop of political turbulence during President Gloria Macapagal-Arroyo's administration, highlighting the role of internal party mechanisms in Philippine political dynamics. The resolution solidifies principles surrounding internal party autonomy and COMELEC's limited intervention in resolving party leadership disputes.