

****Title:**** Arroyo v. De Venecia, et al. (343 Phil. 42)

****Facts:****

The petitioners, members of the Philippine House of Representatives, challenged the validity of Republic Act No. 8240 (RA 8240), which imposed “sin taxes” on beer and cigarettes, alleging procedural violations in its passage. The bill originated in the House as House Bill No. 7198, approved on September 12, 1996. The Senate made amendments and approved it on November 17, 1996. A bicameral conference committee reconciled the versions, and its report was submitted and approved in the House on November 21, 1996, despite interruptions and debates on the quorum. The bill was then signed by the presiding officers of both Houses and enacted by President Fidel V. Ramos on November 22, 1996.

The petitioners claimed the following: the House violated its own rules by not properly addressing the quorum, and the Chair did not entertain objections before adjourning the session. They argued that the certification by Speaker De Venecia that the bill was properly passed was false. In contrast, the respondents relied on the enrolled bill doctrine and the principle of separation of powers, arguing that the court should not interfere with legislative processes.

****Issues:****

1. Whether RA 8240 was passed in violation of the House rules.
2. Whether the alleged procedural violations amounted to a violation of the Constitution.
3. Whether the Court can review the procedures of the legislative process due to the enrolled bill doctrine and separation of powers.

****Court’s Decision:****

****1. Violation of House Rules:****

The Court declared that the House rules were purely internal procedural guidelines. The allegation that these rules were violated did not amount to a constitutional violation. The Court noted no contention that there was actually no quorum when the bill was approved, merely that the presence of a quorum was not properly questioned.

****2. Constitutional Violation:****

The Court reiterated that parliamentary rules and internal proceedings are generally not subject to judicial review unless there is a clear constitutional breach. Here, the petitioners did not demonstrate that any constitutional provision was directly violated. The Court highlighted the consistent stance of both local and international jurisprudence that courts

typically refrain from interfacing with another branch's procedural rules unless a constitutional infringement or rights violation is evident.

****3. Enrolled Bill Doctrine and Separation of Powers:****

The Court emphasized the established judicial doctrine that a bill, once duly enrolled, signed by the presiding officers of both Houses, and approved by the President, is conclusive evidence of its due enactment and not subject to judicial review. The Court cited past decisions affirming this principle and the rule that legislative acts, unless proved contrary from the legislative journals themselves, are presumed valid and duly enacted. The separation of powers doctrine further prevents the judiciary from examining the internal rules of the legislative body unless there's a manifest constitutional issue.

****Doctrine:****

The decision reiterated the "Enrolled Bill Doctrine," stating that the certification of the presiding officers of both the House and Senate that a bill was duly passed is conclusive of its due enactment. The principle of ****separation of powers**** restrains judicial review of the internal procedures of Congress, save for clear cases of constitutional infringements.

****Class Notes:****

- ****Enrolled Bill Doctrine:**** A duly authenticated bill, once signed by presiding officers and the President, is conclusive of its passage and isn't subject to judicial review beyond the explicit constitutional requirements.
- ****Separation of Powers:**** Courts typically refrain from interfering in the internal procedures of the legislature unless a constitutional breach is evident.
- ****Grave Abuse of Discretion:**** Judicial review under the guise of grave abuse of discretion is appropriate only when the act in question transcends constitutional limits, not merely incorrect or procedural in nature.

****Historical Background:****

The case arose during the administration of President Fidel V. Ramos, focusing on legislative efforts to impose taxes on sin products like beer and cigarettes as part of broader fiscal policies. The challenge reflected the common legislative-executive tensions over enacted laws' procedural validity and underscored the judiciary's role in maintaining the balance and boundaries between branches of government. The case reaffirmed enduring legal principles on legislative proceedings and judicial deference amidst post-Marcos constitutional developments enhancing judicial oversight to correct abuses in government powers.