

Title:

**Rep. Raul A. Daza vs. Rep. Luis C. Singson and the Commission on Appointments:
Determining the Validity of House Representation Reorganization**

Facts:

After the May 11, 1987 congressional elections, the House of Representatives apportioned its twelve seats in the Commission on Appointments (CoA) proportionally among various political parties. Rep. Raul A. Daza was listed as a representative of the Liberal Party (LP).

On September 16, 1988, a reorganization in the House took place as twenty-four members of the LP resigned and joined the Laban ng Demokratikong Pilipino (LDP), increasing its numbers to 159 and reducing the LP members to 17. Following this, the House revised its representation in the CoA, removing Daza's seat and allocating it to the LDP. Subsequently, a new set of representatives was elected on December 5, 1988, which included Luis C. Singson from the LDP but excluded Daza.

Daza filed a petition on January 13, 1989, challenging his removal from the CoA and the assumption of his seat by Singson. The Supreme Court issued a temporary restraining order to prevent both Daza and Singson from serving in the CoA pending resolution.

Issues:

1. Is the issue of Daza's removal from the CoA a justiciable matter, or is it a political question beyond the Court's jurisdiction?
2. Was the reorganization of the House representation in the CoA valid under the constitutional provision for proportional representation?
3. Can the lack of registration of the LDP as a political party affect its representation in the CoA?

Court's Decision:

Jurisdiction:

The Supreme Court determined that the matter was justiciable because it involved the legality, not the wisdom, of the act of the House in removing Daza from the CoA. Citing *Tañada v. Cuenco*, the Court held that they had the competence to rule on the validity of the selection process in light of constitutional requirements.

Proportional Representation and Validity:

The Court found that the reorganization in the CoA was reasonable under the Constitution's requirement for proportional representation. The creation of the LDP, materially changing

the political alignments in the House, justified Singson's appointment to the CoA representing the LDP.

Registration of the LDP:

Daza's argument hinged on the LDP not being a registered political party as per the Constitution. However, the Court highlighted that the LDP was subsequently registered as a political party. Moreover, the Court dismissed the notion that the LDP needed to stand the test of time to prove its permanence and observed that the constitutional provision did not exclude new or recently formed political parties from representation in the CoA.

Doctrine:

1. **Political Question vs. Justiciable Issue:** The Supreme Court can rule on issues involving the legality of legislative actions even if they appear to be political questions.
2. **Proportional Representation:** The House of Representatives has the authority to adjust its delegates in the CoA to reflect permanent changes in political alignments.
3. **Temporary vs. Permanent Change:** Temporary political alliances or factional changes do not justify reorganization in the CoA; the change must be permanent and involve formal disaffiliation or shifts in allegiance.

Class Notes:

- **Justiciable Question:** Courts can decide on the legality of legislative decisions concerning constitutional requirements (Tañada v. Cuenco, Art. VIII Sec. 1 of the Constitution).
- **Proportional Representation:** The reorganization must be based on permanent changes in political affiliations (Art. VI, Sec. 18).
- **Political Party Registration:** For representation purposes in the CoA, the party must be registered (1987 Constitution, Article IX-B, Section 2(5)).

Key Legal Concepts:

- Political question
- Justiciable issue
- Proportional representation
- Permanent political realignment
- Party registration

Historical Background:

Post-EDSA Revolution, the 1987 Constitution was instituted, reinstating democratic

institutions including Congress and mechanisms for checks and balances like the Commission on Appointments. The expressed role of political parties and proportional representation in legislative bodies was a response to ensure fair and democratic practices in governance and maintain a balance in the political landscape. This case epitomizes early challenges in this post-Marcos period towards stabilizing democratic institutions amid shifting political alliances and emerging political parties.