

### Title: Astorga v. Villegas

### Facts:

On March 30, 1964, House Bill No. 9266, pertaining to local governance, was filed in the House of Representatives. It passed the third reading without amendments on April 21, 1964, and was then sent to the Senate. The Senate Committee, chaired by Senator Gerardo M. Roxas, recommended a minor amendment that shifted succession to the Vice-Mayor from the City Engineer to the President Protempore of the Municipal Board.

On May 20, 1964, Senator Arturo Tolentino introduced substantial amendments on the Senate floor, which were approved in whole by the Senate, excluding Senator Roxas's minor amendment. On May 21, 1964, the Secretary of the Senate erroneously informed the House that the Senate had passed the bill with the Roxas amendment, not including the Tolentino amendments. The House greenlit this incorrect version, and the bill was printed and signed by the appropriate officers from both houses. It reached the President, who signed the bill into law on June 18, 1964, making it Republic Act No. 4065.

Controversy arose when it was revealed by Senator Tolentino and addressed by the Senate President that the enrolled bill, the version signed into law, did not reflect the actual Senate-passed amendments. The Senate President invalidated his signature on the grounds of the error. Consequently, the President of the Philippines withdrew his signature as well, declaring the law null.

Despite this, Vice-Mayor Herminio A. Astorga sought to enforce the provisions of the supposed Republic Act No. 4065 by filing a petition for "Mandamus, Injunction and/or Prohibition with Preliminary Mandatory and Prohibitory Injunction" against Mayor Antonio Villegas and other officials.

### Issues:

1. Whether the so-called Republic Act No. 4065 was duly enacted into law.
2. Should the Court adhere to the "enrolled bill" doctrine or the "journal entry" rule in this case?

### Court's Decision:

1. **\*\*On the Enactment of Republic Act No. 4065\*\*:**

The Supreme Court ruled that Republic Act No. 4065 was not duly enacted as law. The bill signed by the President of the Philippines lacked the Tolentino amendments, which were a substantial part of the Senate's approval. The enrolled bill, while signed by the legislative

officers and the President, did not reflect the actual legislative intent as evidenced in the Senate journal.

2. **On the Enrolled Bill Doctrine versus Journal Entry Rule**:

The Court opted for the journal entry rule over the enrolled bill doctrine. According to the ruling, while the enrolled bill signed by presiding officers typically signifies legislative approval, the journal entries—which indicated substantial and approved amendments—demonstrated a significant discrepancy in this instance. The journal entries were crucial for an accurate legislative record, invalidating the enrolled bill in its form presented to and signed by the President.

**Doctrines:**

The doctrine established is that the authenticity of a legislative bill may be scrutinized beyond the enrolled bill. The journal entry rule may take precedence over the enrolled bill doctrine when there is a material discrepancy between the content of the bill presented for presidential approval and the legislative record in the journals. The signatures of legislative officers in the enrolled bill do not conclusively validate the bill if shown otherwise in the journal.

**Class Notes:**

- **Enrolled Bill Doctrine**: Typically the certified signed copy of the legislative bill which is presented to the President for his signature. Generally considered incontestable evidence of its contents and proper enactment.
- **Journal Entry Rule**: An alternative standard where scrutiny of legislative journals is permitted to verify the bill's actual contents and passage procedures.
- **Case Citation**: The ruling in **Astorga v. Villegas** holds that in circumstances of significant discrepancies between the entered journal and the enrolled bill, the journal entries may be more reliable.
- **Presiding Officers' Signatures**: Traditionally a method of authenticating legislative approval, but not absolute proof of proper legislative process and content.

**Historical Background:**

The context of the case is set during the early 1960s when legislative mechanisms in the Philippines were under significant scrutiny. The significance of legislative process accuracy and the integrity of legislative documents became a focal point against the backdrop of a young post-colonial government refining its procedures and democratic institutions. The Astorga case highlighted the necessity for meticulous procedural adherence to maintain

legislative integrity and public trust in the law-making process.