

Title: Alejo Mabanag et al. vs. Jose Lopez Vito et al.

Facts:

1. **Petition for Prohibition**: A group comprising eight senators, seventeen representatives, and three political party presidents filed a petition to the Philippine Supreme Court to prohibit the enforcement of a congressional resolution proposing an amendment to the Philippine Constitution.
2. **Suspension of Legislators**: Three senators were suspended post-election for alleged irregularities, and eight representatives were not allowed to sit in the House of Representatives for similar reasons, except briefly to elect the Speaker. A resolution for their suspension had been proposed but not yet acted upon when the petition was filed.
3. **Resolution Proposal**: The resolution proposed an amendment to be appended as an ordinance in the Constitution, allowing U.S. citizens and enterprises the same rights as Filipinos in utilizing public natural resources and operating public utilities.
4. **Voting in Congress**: During the resolution's passage, only those not under suspension voted. Hence, 16 out of 21 senators and 68 out of 88 representatives voted in favor. This excluded the suspended members from vote calculations, falling short of the constitutionally required three-fourths majority.
5. **Legal and Procedural Posture**:
  - A congressional resolution proposing an amendment requires a three-fourths vote of all members of both the Senate and House of Representatives, voting separately.
  - Whether the courts have jurisdiction over this political decision was contested.

Issues:

1. **Jurisdiction**: Should the Supreme Court exercise jurisdiction over an enrolled bill/resolution's conclusive nature, determining if the necessary voting threshold was reached?
2. **Political Question Doctrine**: Does the proposal and adoption process of constitutional amendments fall under non-justiciable political questions that are immune to judicial review?
3. **Validity of Legislators' Suspension**: Whether the exclusion of the suspended legislators from the vote count invalidated the resolution's passage.

4. **Interpretation of Constitutional Provisions**: Should the enrolled bill, which reflected a certified legislative action, be immune from judicial scrutiny?

Court's Decision:

1. **Jurisdiction**:

- The Court initially indicated that the respondents denied its jurisdiction based on the conclusiveness of an enrolled resolution.
- Citing U.S. precedent, mid-20th century doctrinal developments argued courts must respect certified legislative enactments due to the separation of powers. However, there is a nuanced distinction between conclusive jurisdiction and the probative value of such certifications in courts.

2. **Political Question Doctrine**:

- The Court concluded the process of proposing constitutional amendments involves political questions outside judicial purview. Proposal and ratification are interconnected political actions decided by sovereign legislative functions.
- Analogies were drawn from U.S. Supreme Court precedents, notably *Coleman vs. Miller*, identifying the entirety of the amendment process, from proposal to ratification, as inherently political, thus non-justiciable.

3. **Validity of Legislators' Suspension**:

- It acknowledged, without resolving, the asserted irregularities in legislator suspensions but held such procedural aspects encapsulated political decisions beyond judicial scrutiny.
- Determination of quorum and member suspension revolved around internal legislative practices, maintaining the conclusive nature of certified legislative actions.

4. **Interpretation of Constitutional Provisions**:

- The Court embraced the enrolled bill rule, signifying certified legislative proceedings as conclusive proof of proper enactment despite argued irregularities in excluded vote counts.
- The Court upheld the legislative certifications as reflecting the required three-fourths votes, adhering to precedent respecting legislative conclusion certifications to maintain checks and balances among government branches.

Doctrine:

1. **Political Question Doctrine**: Matters related to constitutional amendments are political questions beyond judicial reach, involving procedural legislative sovereignty.

2. **Enrolled Bill Rule**: Legislatively certified documents hold conclusive evidentiary power reflecting proper legislative action, non-reviewable by courts barring clear constitutional violation within judicial purview.

#### Class Notes:

1. **Political Question Doctrine**: Concept that certain issues, particularly involving legislative processes, are deemed non-justiciable due to their political nature. Courts typically avoid interference in purely political functions.

2. **Enrolled Bill Doctrine**: Once legislation is duly certified by legislative officers, it's conclusively presumed to have met all procedural requirements, making judicial review on procedural grounds generally impermissible.

3. **Section 1, Article XV**: Signifies the stringent requirements for amending the constitution, necessitating a three-fourths vote from both the Senate and House members.

4. **Rule of Three-Fourths**: Constitutional amendments require affirmative votes from a supermajority (three-fourths) of each House's total membership—not just those present and voting.

#### Historical Background:

- The context marks post-World War II Philippines during the nascent phase of its independence. The proposed constitutional amendment to align with economic agreements with the United States reflects the strategic alignment and economic dependency issues the Philippines navigated during this transitional period. The political dynamics, including electoral contestations and legislative procedural propriety, underline the emergent republic's governance challenges.

These elements emphasized judicial restraint in political arenas, reinforcing the legislative process's autonomy amidst evolving democratic practices in the Philippines.