

Title: Guingona Jr. v. Gonzales, et.al. (G.R. No. 103142, 1992)

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Facts:

In the aftermath of the May 11, 1992, national elections, the Philippine Senate was composed as follows:

- Liberal Democratic Party (LDP): 15 senators
- Nationalist People's Coalition (NPC): 5 senators
- Lakas-National Union of Christian Democrats (Lakas-NUCD): 3 senators
- Liberal Party-Philippine Democratic Party-Laban (LP-PDP-Laban): 1 senator

Utilizing the agreed-upon mathematical formula for proportional representation, the seats in the Commission on Appointments (CA) were distributed as:

- LDP: 7.5 seats
- NPC: 2.5 seats
- Lakas-NUCD: 1.5 seats
- LP-PDP-Laban: 0.5 seat

During the August 27, 1992, organizational meeting of the Senate, Senator Alberto Romulo (LDP) nominated eight senators from the LDP for the 12-member CA, leading to a dispute raised by Senator Teofisto Guingona of Lakas-NUCD.

Senator Arturo Tolentino proposed a temporary compromise, enabling the contested election of eight LDP members, two NPC members, one LP-PDP-Laban member, and one Lakas-NUCD member to the CA. This list included Senator Romulo (LDP) and Senator Wigberto Tañada (LP-PDP-Laban).

Subsequently, on September 23, 1992, Senator Guingona and Lakas-NUCD petitioned for a writ of prohibition to prevent the recognition of Romulo and Tañada as CA members, alleging the arrangement violated proportional representation mandated by the 1987 Constitution.

Issues:

1. Whether the election of Senators Alberto Romulo and Wigberto E. Tañada to the CA was in line with Section 18, Article VI of the 1987 Constitution.
2. Whether the actions of the Senate amount to grave abuse of discretion in electing these senators.

3. Whether a writ of prohibition should be issued to prevent the respondent senators from serving in the CA.

Court's Decision:

1. **Election of Senators Romulo and Tañada**:

- **Violation of Proportional Representation**: The Court found that the election of Romulo and Tañada violated Section 18, Article VI as their election enabled the LDP majority to add more representatives than allowed by proportional representation.

- **Fractional Representation vs Whole Membership**: The Court reasoned that each party's .5 fractional seat cannot be aggregated to form a whole seat for one party, as this distorts the balance of proportional representation.

2. **Grave Abuse of Discretion**:

- The Court ruled that the LDP majority, by electing extra senators, acted in grave abuse of discretion. This act, done with the knowledge of being in breach of constitutional provisions, sidestepped the rule of proportional representation, thereby overstepping the bounds set by the 1987 Constitution.

3. **Writ of Prohibition**:

- **Issuance Granted**: The Supreme Court issued the writ of prohibition, ordering Senators Romulo and Tañada to cease functioning as CA members and preventing Senate President Gonzales from recognizing them as members.

Doctrine:

1. **Rule of Proportional Representation**: Section 18, Article VI mandates that membership in the CA must strictly adhere to proportional representation from political parties represented in the Senate.

2. **Minimum Membership Requirement**: A political party must have at least two senators for one seat in the CA.

3. **No Requirement for Full Membership**: The Constitution doesn't necessitate a full quorum of twelve seats for the CA to function.

Class Notes:

- **Proportional Representation**: Critical in bodies such as the CA to prevent the majority party from overwhelming the minority.

- **Constitutional Mandates**: Any action by a legislative majority that undermines rules set by the Constitution constitutes grave abuse of discretion.

- **Exceptions to Full Membership**: The CA, like other constitutional bodies, can perform its functions without a full quorum, provided a majority is present.

Relevant Statutory Provisions:

- **Section 18, Article VI, 1987 Constitution**: Details the composition and functioning rules of the CA.

- **Case Precedents**: Coseteng vs. Mitra, Jr. (187 SCRA 377, 1990), Daza vs. Singson (180 SCRA 496, 1989), Omeña vs. COMELEC (199 SCRA 750, 1991).

Historical Background:

The case underscores the evolving dynamics of political power adjustment post-martial law era in the Philippines. The 1987 Constitution reformed institutional checks and balances heavily influenced by abuses witnessed during the Marcos dictatorship, emphasizing the need for proportional and fair representation in legislative processes. This case serves as a safeguard against majoritarian excesses and upholds the constitutional intent of balanced political representation in high-stake appointments.