

Lamberto Macias, et al. vs. The Commission on Elections, et al.

113 Phil. 1 (1961)

Facts

Background:

- The petitioners, comprising four members of the House Representatives from Negros Oriental, Misamis Oriental, and Bulacan, plus the provincial governor of Negros Oriental, challenged Republic Act No. 3040, which apportioned representative districts in the Philippines.

- The petitioners argued that RA 3040 was unconstitutional on three grounds:

1. The bill was passed without printed final copies being provided to the Members of the House at least three calendar days before its passage.
2. RA 3040 was approved more than three years after the return of the last census of the population.
3. The law apportioned districts without regard to the number of inhabitants in the several provinces.

Proceedings:

- Respondents, represented by various government officials including the National Treasurer, admitted some allegations but contested others, asserting the constitutionality of the law.

- The respondents further argued that petitioners lacked the legal standing to sue, citing procedural compliance presumption stemming from certified copies of the law.

- However, respondents failed to demonstrate compliance with the provision requiring printed copies of the bill at least three days before its passage.

Issues

1. **Legal Standing:** Do the petitioners have the legal standing to challenge Republic Act No. 3040?
2. **Compliance with Procedural Requirements:** Was RA 3040 passed in conformity with the constitutional provision requiring printed final copies to be furnished to Members of the House three calendar days before its passage?
3. **Census Return Requirement:** Was the apportionment under RA 3040 compliant with the constitutional mandate of being based within three years of the return of the census?
4. **Equal Representation:** Did RA 3040 adhere to the principle of proportional

representation according to the number of inhabitants?

Court's Decision

1. Legal Standing:

- The Court affirmed the petitioners' legal standing, citing previous rulings and interpretations from various cases affirming voters' rights to question apportionment acts that allegedly infringe constitutional mandates.

2. Compliance with Procedural Requirements:

- While the failure to furnish printed copies was alleged, the Court did not base its decision on this issue specifically, opting not to make a definitive pronouncement on the procedural non-compliance given the clear infringement identified in the apportionment issue.

3. Census Return Requirement:

- An enumeration report relevant for RA 3040 was submitted to the President on November 23, 1960, regarded as a preliminary count.

- The court deemed this preliminary report insufficient under certain interpretations but ultimately did not rule explicitly on this basis because the primary issue lay in the apportionment disparities.

4. Equal Representation:

- The Court found significant violations in RA 3040 regarding equal representation. Misapportionment examples included Cebu getting seven members while Rizal, with more inhabitants, got four; Cotabato receiving less representation than Manila despite more inhabitants; and several other disproportional allocations cited.

- Following precedent and judicial views on similar issues from jurisdictions with comparable provisions, the Court held that such misapportionments render the statute unconstitutional.

Doctrine

- **Equal Representation:** The ruling reiterated the principle of proportional representation as mandated by the Constitution. Legislative districts must be apportioned as nearly as possible according to the number of inhabitants to ensure equality in representation.

Class Notes

- **Legal Standing:** Citizens and legislators may challenge apportionment acts if they have sufficient interest, especially when it affects their elective franchise under constitutional provisions.
- **Procedural Compliance:** Legislative procedures prescribed by the Constitution (e.g., printed bill requirement) must be strictly followed to avoid nullification.
- **Proportional Representation:** Apportionment laws must comply with constitutional mandates of equal representation based on population counts. Significant deviations leading to disproportionate representation are unconstitutional.

Historical Background

- **Context:** This decision came during a period of transitioning governance structures in the Philippines, which sought to refine democratic processes including fair legislative representation. It underscores the judiciary's role in maintaining constitutional order, reinforcing checks on legislative practices.