

Title: Philippine Constitution Association, Inc. vs. Ismael Mathay and Jose Velasco

Facts:

- The Philippine Constitution Association, Inc. (PHILCONSA), a non-stock, non-profit entity composed of Filipino citizens and taxpayers, filed a suit against Ismael Mathay, the former Acting Auditor General, and Jose Velasco, Auditor of the Congress of the Philippines.
- PHILCONSA sought to enjoin officials from authorizing or auditing payment of increased salaries under Republic Act No. 4134 before December 30, 1969.
- Republic Act No. 4134, approved June 10, 1964, increased salaries for the President of the Senate, the Speaker of the House, and members of both houses, with the provision that increases would take effect per constitutional guidelines.
- Article VI, Section 14 of the Constitution mandates that such increases only take effect after the expiration of the full term of all members approving the increase.
- The Appropriation Act for fiscal year 1965-1966 included increased salary appropriations starting December 30, 1965. This implementation of RA 4134 was contested on constitutional grounds.
- After PHILCONSA lodged a written protest, the Auditor General referred the matter to the Solicitor General and then to the Secretary of Justice. Before any legal opinion was issued, salary disbursements with the increased rate commenced.
- Respondents argued that petitioners lacked legal standing and that the merits of the salary increases pertained only to members of the House who were elected after the RA 4134 approval.

Issues:

1. Whether PHILCONSA had standing to file the suit.
2. Whether the salary increases mandated by RA 4134 could take effect before December 30, 1969.
3. Whether RA 4642, the Appropriations Act, violated Article VI, Section 14 of the Constitution by implementing salary increases before the stipulated date.

Court's Decision:

1. **\*\*Standing:\*\***

- The Court held that taxpayers like PHILCONSA have standing to bring action against government officials to prevent the unlawful expenditure of public funds.
- Cited precedents affirmed taxpayers' rights to challenge actions involving illegal disbursement of public funds.

2. **Salary Increase Implementation:**

- The Court interpreted Article VI, Section 14 of the Constitution, requiring any salary increase for the legislature to take effect only after the expiration of the full term of all members who approved it.
- Both houses of Congress—the Senate and the House of Representatives—constituted a single legislative body. Therefore, the salary increase could only take effect after the terms of the longest-serving members who approved the increase expired, i.e., Senators whose terms ended on December 30, 1969.

3. **Constitutionality of RA 4642:**

- The Court invalidated the sections of RA 4642 that authorized the immediate payment of increased salaries from December 30, 1965, ruling it unconstitutional.
- Held that increased salaries as per RA 4134 could not be lawfully disbursed until December 30, 1969.

Doctrine:

- The legislative salary increase can only take effect after the expiration of the full term of all members of Congress that approved such increase. The intent is to avoid self-serving legislation by ensuring that those who vote for a pay increase cannot benefit from it within their own term.

Class Notes:

1. **Standing of Taxpayers:** Taxpayers can challenge government expenditures on the grounds of illegality or unconstitutionality.
2. **Legislative Salary Increase:** Any increase approved by legislators must be deferred until after the expiry of the full term of all members who approved it, ensuring the legislative body is treated as a single unit.
3. **Constitutional Provision Reference:** Article VI, Section 14.

Historical Background:

- The case took place in the socio-political context of the 1960s, a period that saw increased scrutiny of government actions and a push for legislative reforms. The decision ensured legislative integrity by adhering to constitutional checks designed to prevent immediate financial self-interest among sitting members of Congress.