

****Title:****

GARCIA v. MATA, NO. L-28113, 160 PHIL. 536 (1960)

****Facts:****

Eusebio B. Garcia, a reserve officer, was on active duty in the Armed Forces of the Philippines (AFP) until November 15, 1960, when he was reverted to inactive status under the provisions of Republic Act (R.A.) No. 2334. Garcia held the rank of Captain and earned P478.00 per month at the time of his reversion.

- ****June 18, 1955:**** R.A. No. 1382 took effect, at which time Garcia had 9 years, 4 months, and 12 days of active commissioned service.
- ****July 11, 1956:**** When R.A. No. 1600 became effective, Garcia's active commissioned service totaled 10 years, 5 months, and 5 days.
- ****November 15, 1960:**** Garcia was reverted to inactive status, not due to request, cause, or court-martial proceedings.

From November 15, 1960, Garcia remained on inactive status without government employment or emoluments. He filed petitions for reinstatement and payment of emoluments with the AFP Chief of Staff, the Secretary of National Defense, and the President; however, only the AFP Chief of Staff responded.

****Procedural Posture:****

- ****September 17, 1969:**** Garcia filed a mandamus and recovery action to compel reinstatement, rank readjustment, and payment of withheld emoluments.
- ****December 2, 1970:**** The Court of First Instance (CFI) of Quezon City rejected the petition, declaring Paragraph 11 of the "Special Provisions for the AFP" in R.A. No. 1600 unconstitutional.
- Garcia's motion led to an appeal to the Supreme Court.

****Issues:****

1. ****Constitutionality of Paragraph 11 of R.A. No. 1600:**** Whether Paragraph 11, preventing the reversion of reserve officers with at least 10 years of service unless for cause, by court-martial, or at their request, was constitutional and pertinent to the Appropriation Act.
2. ****Interpretation and Application:**** Whether the application of R.A. No. 2334's provisions was proper regarding Garcia's reversion to inactive status under existing laws.

****Court's Decision:****

The Supreme Court resolved these issues as follows:

1. **Constitutionality of Paragraph 11, R.A. No 1600:**

- **Relevance to Appropriation Act:** Paragraph 11 was found irrelevant to any appropriation item, breaching Art. VI, Section 19, Paragraph 2 of the 1935 Constitution.
- **Title Requirement:** The provision also violated Art. VI, Section 21, Paragraph 1 of the 1935 Constitution as the subject (reserve officer status) was unrelated to the Act's title (appropriating funds for government operations). Therefore, it was invalid and inoperative.

2. **Application of R.A. No. 2334:**

- **Proper Reversion to Inactive Status:** The Court found the application of R.A. No. 2334 correct; Garcia, being in active service for more than two years when R.A. No. 2334 took effect, was lawfully reverted to inactive status within the given timeframe stipulated by the Act.
- **Comparison with Other Relevant Laws:** The Court also examined R.A. Nos. 1382 and 1600, confirming Garcia's lack of entitlement under these laws due to an insufficient active service period when initial laws became effective. Garcia could not claim vested rights to permanent status, and the legislature was within its authority to adjust reserve officer statuses.

The Supreme Court affirmed the lower court's decision, denying Garcia's petition and dismissing the case.

Doctrine:

The Supreme Court reiterated that general appropriation bills should only contain provisions pertaining specifically to appropriations therein (Art. VI, Section 19, Paragraph 2, 1935 Constitution). Any unrelated provisions are unconstitutional. A provision's relevance must align with the title of the Act (Art. VI, Section 21, Paragraph 1, 1935 Constitution).

Class Notes:

1. **Republic Act No. 1382:** Protection of reserve officers with ten years of active service from involuntary reversion, barring cause or court-martial proceedings.
2. **Republic Act No. 1600:** Appropriation Act for FY 1956-57, Paragraph 11 deemed unconstitutional concerning reserve officers' status changes.
3. **Republic Act No. 2334:** Required reversion of reserve officers exceeding two years of duty within five consecutive years, overriding previous provisions including R.A. No. 1600.
4. **Constitutional Provisions:**

- **Art. VI, Sec. 19 (1935):** Prohibition against unrelated provisions in appropriation bills.
- **Art. VI, Sec. 21 (1935):** One subject per act requirement, expressed in title.

Historical Background:

This case situates itself during a period of defining boundaries of legislative provisions tied to military personnel and fiscal appropriations within the Philippines. This was within the agenda of ensuring appropriate and focused use of legislative power, avoiding incongruent legislative riders that could misuse the general appropriation acts. This case helped clarify and enforce constitutional boundaries crucial for legislative integrity in the Philippines' legal landscape.