

****Title:****

Bengzon, Jr. et al. vs. Senate Blue Ribbon Committee

****Facts:****

1. ****Initial Proceedings:****

- On July 30, 1987, the Republic of the Philippines, represented by the Presidential Commission on Good Government (PCGG) and assisted by the Solicitor General, filed a case with the Sandiganbayan (Civil Case No. 0035, also known as PCGG Case No. 35) against Benjamin “Kokoy” Romualdez and others for reconveyance, reversion, accounting, restitution, and damages.

2. ****Role of Petitioners:****

- The complaint was later amended to include various new defendants, including the petitioners aligned with Benjamin Romualdez. The complaint alleged significant illicit activities for unjust enrichment at the expense of the Republic by using Romualdez’s connection with Ferdinand Marcos.

3. ****Allegations Against Petitioners:****

- Specific allegations included financial maneuvers, misuse of public funds, fictitious sales, and attempts to hide assets to evade government scrutiny.

4. ****Media Reports and Political Reactions:****

- Conflicting media reports arose in August 1988 about the PCGG’s disposition of Romualdez corporations, leading to widespread speculation about illicit activities involving these firms.

5. ****Senatorial Inquiries:****

- Senate Minority Leader Juan Ponce Enrile delivered a speech in September 1988 addressing these allegations and called upon the Senate to investigate possible violations of anti-graft laws. The Senate referred the matter to the Blue Ribbon Committee, triggering an investigation into possible unlawful acquisitions and sales involving Romualdez’s firms.

6. ****Committee Subpoenas:****

- The Senate Blue Ribbon Committee subpoenaed petitioners, including Ricardo Lopa, to testify about the sale of companies allegedly involved with Romualdez. Some petitioners refused to testify, invoking their constitutional rights and expressing concerns about due

process.

7. **Addressing Constitutional Issues:**

- Despite petitioners' constitutional objections, the Senate Blue Ribbon Committee decided to continue its investigation, leading the petitioners to file for a petition for prohibition with the Supreme Court, seeking to restrain the committee from compelling their testimony.

8. **Motion for Intervention:**

- Jose S. Sandejas, one of the defendants in Civil Case No. 0035, moved to intervene in the petition, granted by the Court, requiring further responses from the Senate Committee.

Issues:

1. **Validity of Legislative Inquiry:**

- Whether the Senate Blue Ribbon Committee's inquiry is valid and within the bounds of being conducted "in aid of legislation"?

2. **Separation of Powers:**

- Whether the conduct of the inquiry by the Senate Blue Ribbon Committee infringes on the judicial domain, given the ongoing Sandiganbayan case.

3. **Constitutional Rights:**

- Whether compelling petitioners to testify violates their constitutional rights, particularly the right to due process and the right against self-incrimination.

Court's Decision:

- **Legislative Purpose:**

- The Court agreed with the petitioners, finding that the Blue Ribbon Committee's inquiry lacked a clear legislative purpose. Senator Enrile's speech did not suggest any intent to propose new legislation, but merely to assess potential violations of existing laws, which is a matter for the judiciary.

- **Judicial Encroachment:**

- The Court ruled that allowing the Senate inquiry would be an encroachment on the judiciary's domain. Since the same issues were already being handled by the Sandiganbayan, the Committee's parallel investigation was inappropriate and posed a risk of conflicting judgments, violating the doctrine of separation of powers.

- **Constitutional Rights Violation:**

- The Court found that the inquiry was in violation of the petitioners' constitutional rights. Since the Sandiganbayan case was ongoing, compelling the petitioners to testify could influence the judicial process and potentially prejudice their right to a fair trial.

Doctrine:

- **Separation of Powers:**

- Legislative inquiries must have a clear legislative purpose and cannot encroach on matters within the exclusive purview of the judiciary. Investigations should be in aid of potential legislation, not judicial actions.

- **Right Against Self-Incrimination:**

- The right against self-incrimination allows individuals to refuse to answer questions in legislative inquiries if such questions are likely to incriminate them in ongoing judicial proceedings.

Class Notes:

- **Key Principles:**

- **Legislative Inquiry in Aid of Legislation (Art. VI, Sec. 21, 1987 Constitution):** Legislative bodies possess the power to conduct inquiries in aid of legislation, respecting constitutionally protected rights.

- **Separation of Powers (Angara vs. Electoral Commission):** Courts only mediate boundaries among governmental powers; however, the judicial department resolves actual constitutional conflicts.

- **Right Against Self-Incrimination (Art. III, Sec. 17, 1987 Constitution):** Protects individuals from being compelled to testify against themselves in any proceeding.

- **Relevant Statutes:**

- **Constitutional provision on legislative inquiries (Art. VI, Sec. 21):** Ensuring inquiries are conducted in aid of legislation and respecting individual rights.

- **Anti-Graft and Corrupt Practices Act (Rep. Act No. 3019):** Prohibits public officials and their relatives from engaging in corrupt practices, including unauthorized transactions involving government funds.

Historical Background:

- **Political Climate:**

- The case emerged in the aftermath of the 1986 People Power Revolution that ousted President Ferdinand Marcos and instituted President Corazon Aquino, prompting a wave of inquiries aimed at recovering ill-gotten wealth amassed during the Marcos regime.

- **PCGG Role:**

- The PCGG was established to recover such ill-gotten wealth and faced significant public and legislative scrutiny over its efficiency and integrity, reflecting broader societal efforts to combat corruption and restore public trust in government institutions following decades of authoritarian rule.