

Commission on Elections v. Conrado Cruz et al., G.R. No. 186616

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Facts:

1. **Enactment of RA 9164**: Republic Act (RA) No. 9164 provided for synchronized barangay and Sangguniang Kabataan (SK) elections and included a provision establishing a three-term limit for barangay officials, starting from the 1994 barangay elections.
2. **October 29, 2007 Elections**: Prior to these elections, incumbent barangay officials of Caloocan City filed a petition for declaratory relief at the Regional Trial Court (RTC), challenging the constitutionality of the three-term limit provision.
3. **RTC Ruling**: The RTC declared the three-term limit provision unconstitutional, ruling that it retroactively applied term limits and violated equal protection. It also said the legislative title did not give clear notice of its contents.
4. **COMELEC Motion**: COMELEC moved for reconsideration, which the RTC denied, prompting COMELEC to petition the Supreme Court.

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Issues:

1. **Retroactivity**: Did RA 9164 retroactively apply the three-term limit for barangay officials?
2. **Equal Protection**: Did the retroactive application of the term limit provision violate the equal protection clause?
3. **One Subject-One Title Rule**: Did RA 9164 violate the constitutional rule requiring laws to cover only one subject expressed in the title?

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Court's Decision:

1. **Retroactivity**:
 - **Supreme Court's Interpretation**: The Court found that RA 9164 did not create a new

retroactive rule; rather, it reiterated an existing three-term limit initially imposed by RA 6653 and RA 6679, and continued under the Local Government Code (RA 7160).

- **Historical Context**: The three-term limit had been in place since the 1994 barangay elections and was not a new retroactive application, contradicting the RTC's interpretation.

2. **Equal Protection**:

- **Constitution's Distinction**: The Constitution allows different treatments for local elective officials and barangay officials. The Court noted that disparate application recognized by the Constitution means no equal protection violation occurred.

- **No Unjust Discrimination**: RA 9164 treated barangay officials the same as other local elective officials in terms of term limitations, confirming no discrimination or equal protection breach.

3. **One Subject-One Title Rule**:

- **Sufficient Title Notification**: The title of RA 9164, "An Act Providing for Synchronized Barangay and Sangguniang Kabataan Elections," was deemed comprehensive enough to include provisions on term limits.

- **Legislature's Intent**: The legislative history and debates indicated that the legislators and the public were aware of the inclusion of term limits in the synchronization act, satisfying the constitutional requirement.

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Doctrine:

1. **Non-Retroactivity of Statutes**: Laws are not retroactive unless explicitly stated. However, subsequent laws can reiterate prior provisions without creating retroactive impacts.

2. **Equal Protection Clause**: Laws can treat different classes of people or officials differently if there's a substantial distinction related to the law's objective.

3. **One Subject-One Title Rule**: The title of a law must be sufficiently comprehensive to notify its subjects but does not need to be an exhaustive index; related matters that support the main purpose may be included.

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Class Notes:

1. **Constitution, Article III, Section 2**:

- **Equal Protection**: Treatment under the law must be the same for those similarly situated unless a substantial and relevant difference justifies differing treatment.

2. **Constitution, Article VI, Section 26(1)**:

- **One Subject-One Title**: The law's title must comprehensively reflect its contents, ensuring transparency and legislative intent.

3. **Public Office as a Public Trust**: Public office is not a vested property right; it is a trust conferred by law.

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Historical Background:

The barangay, as the smallest administrative division in the Philippines, has evolved significantly from pre-colonial to contemporary times. The 1987 Constitution's recognition of barangays as political units granted them a specific role within the local government structure. RA 9164's revisit of term limits was structured to ensure consistency and prevent prolonged local tenure, enhancing accountability and representative democracy.