	A	B
Net income subject to tax	₱9,000	₱509,000
Tax due	740	311,540
Less: Tax Credit (6 x ₱115)	690	690
Tax still due	₱ 50	₱310,850

Under this illustration while A's tax due is reduced by ₱10, B's tax due is increased by ₱4.210.

The figures used are for illustration purposes only To arrive at more realistic figures statistical study could be resorted to. This would allay the fear of Commisioner Plana that an increase in personal and additional exemptions would erode the tax base and that due to consequent loss of revenue, the government might resort to taking by the left what was given by the right hand.[53]

The same tax credit system recommended in paragraph (e), **supra**, should be utilized in adjusting the deductible tuition fees and medical care expenses. At present, these are pegged at the maxi-determining the number of exemptions multiplied by a fixed amount mum amount of ₱1,000 and ₱2,000, respectively.[54]

f) Finally, the ostentatious display of wealth by some government official as wel as the unnecessary expenditures in the government should be avoided. This would prevent the normal tendency of channelled to some personal end and encourage them to pay voluntarily the correct amount of taxes.

[53] See unnumbered BIR ruling dated February 16, 1976. This is a pro-forma letter of the Commissioner to those seeking increase in personal and additional deductions.

[54] See Section 30(a)(2)(A) and (B) of the Tax Code.

SUPREME COURT DOCTRINES

Compiled by:

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CIVIL LAW

AUTHORITY OF DIRECTOR OF LANDS TO ENTER INTO A CONTRACT OF LEASE

The Director of Lands acted within his power and authority as head of the Division of Landed Estates when he entered into the contract of lease for a period of 10 years renewable for a like period, at the lessee's options.

The Director of Lands was not acting merely as an agent in the sense that he still needed a special power of attorney to lease the real property to another person for more than one year under Article 1878 (8) of the Civil Code. After the war, administration of the Crisostomo Estate was turned over to the Rural Progress Administration by Administrative Order No. 36 issued by President Manuel Roxas, and thereafter, on November 28, 1950, administration reverted to the Bureau of Lands, particularly in the latter's newly created division of Landed Estates. When the Director of Lands, therefore, leased the property to defendant, he did so as a public officer and he represented the government and stood for it as an "arm of the state." He acted by virtue of an authority vested in him by law and needed no further delegation of power. He was clothed with some part of the sovereignty of the state. He acted as a "vice principal" defined as "one vested with the entire man-

agement, control, and supervision of a particular work to be done, so as to say, not only what shall be done, but how it shall be done, and has full power and authority to command the men under him in the work, and the work is under his practical direction and control, save and except as he may receive directions from time to time from his employer, and there is ordinarily no one else present and authorized to superintend and direct the work of the men. He then represents the employer — stands for the employer. When a foreman of a gang of men is invested with such control he is a vice principal." Directly empowered to handle the various phases of authority (presently) undertaken by the Rural Progress Administration, it was his duty to administer the Crisostomo Estate as he saw best and fit. (Republic v. Diaz, G.R. No. L-36486, August 6, 1979)

CANCELLATION OF AN ENTRY IN A CIVIL REGISTRY

Long settled is the rule that the errors which can be corrected or cancelled under the summary procedure contemplated in Article 412 of the Civil Code, as implemented in Rule 108, refer to clerical errors or harmless and innocuous changes but not to substantial and controversial matters.

Since the entry sought to be cancelled concerns the status of a child as legitimate or illegitimate and the civil status of the parents as married or unmarried, the alleged error refers to a substantial and vital matter. Its cancellation is not covered by Rule 108. (Republic v. Barbers, G.R. No. L-48720, October 30, 1979)

POSSESSION IN GOOD FAITH

There is no question that a possessor in good faith is entitled to the fruits received before the possession is legally interrupted. Possession in good faith ceases or is legally interrupted from the moment defects in the title are made known to the possessor, by extraneous evidence or by filing of an action in court by the true owner for the recovery of the property. Hence, all the fruits that the possessor may receive from the time he is summoned in court, or when he answers the complaint, must be delivered and paid by him to the owner or lawful possessor. (Ortiz v. Kayanan G.R. No. L-32974, July 30, 1979)

PROPERTY ACQUIRED DURING THE MARRIAGE PRESUMED TO BE CONJUGAL

Petitioners claim that since the lot in question was registered in the name of Felimon Torela, married to Graciana Gallego, it must be presumed to be the conjugal property of Felimon and Graciana so that one half thereof should be adjudicated to them as their inheritance from their mother.

While it is true that all property of the marriage is presumed to be conjugal, as above stated, nonetheless the party who invokes the presumption must first prove that the property was acquired during the marriage. The proof is a condition **sine qua non** for the application of the presumption.

In the instant case there is nothing in the record to show that the lot in question was acquired during the marriage of Felimon Torela and Graciana Gallego.

The circumstance that Decree No. 44057 of the CFI of Negros Occidental which confirmed the ownership of Felimon Torela over the land in question described him as married to Graciana Gallego was merely descriptive of his civil status at that time and cannot be taken as proof that the land was acquired during their coverture. The further circumstance that the land was registered during the marriage cannot in itself constitute proof that it was acquired during their marriage for land registration under Act 446 as amended does not confer title; it merely confirms a title already existing and which is registerable. (Torela v. Torela, G.R. No. L-27843, October 11, 1979)

QUASI-DELICT

1. Petitioner's cause of action against Timbul in the civil case is based on quasi-delict. Consequently, respondent judge committed reversible error when he dismissed the civil suit against truck-owner, as said case may proceed independently of the criminal proceeding and regardless of the result of the latter. (Article 31, New Civil Code)

2. Civil Case No. 80803 is not barred by the fact that petitioner failed to reserve, in the criminal action, his right to file on independent civil action based on quasi-delict. (Mendoza v. Arrieta, L-32599, June 29, 1979)

TRANSFER OF OWNERSHIP, EXECUTION SALES

1. When the glass and wooden jalousies in question were delivered and installed in the leased premises, Capitol became the owner thereof. Ownership is not transferred by perfection of the contract but by delivery, either actual or constructive.. This is true even if the purchase has been made on credit, as in the case at bar. Payment of the purchase price is not essential to the transfer of ownership as long as the property sold has been delivered. Ownership is acquired from the moment the thing sold was delivered to the vendee, as when it is placed in his control and possession.

2. The items in question were illegally levied upon since they do not belong to the judgment debtor. The power of the court in execution of judgment extends only to properties unquestionably belonging to the judgment debtor. The fact that Capitol decided to pay Jalwindor the purchase price of the items levied upon did not prevent the transfer of ownership to Capitol. The complaint of Sampaguita to nullify the sheriff's sale is well-founded and should prosper. Execution Sales affect the rights of judgment debtor only, and the purchaser in the auction sale acquires only the right as the debtor has at the time of the sale. Since the items already belong to Sampaguita and not to Capitol, the judgment debtor, the levy and auction sale, are accordingly null and void.. It is well settled in this jurisdiction that the sheriff is not authorized to attach property not belonging to the judgment debtor. (Sampaguita Pictures Inc. v. Jalwindor Manufacturers, G.R. No. L-48059, October 11, 1979

USING NAMES OF DECEASED PARTNERS IN THE PARTNERSHIP NAME PROHIBITED

In as much as "Sycip, Salazar, Feliciano, Hernandez and Castillo" and "Ozaeta, Romulo, de Leon, Mabanta and Reyes" are partnerships, the use in their partnership name of the names of the deceased partners will run counter to Article 1815 of the Civil Code which provides that "every partnership shall operate under a firm name, which may or may not include the name of one or more of the partners. Those who, not being members of the partnership, include their names in the firm name, shall be subject to the liability of the partner."

It is clearly implied in the above provision that names in a firm name of a partnership must either be those of living partners or in the case of non-partners, should be living persons who can be subjected to liability. (Petition for Authority to Continue Use of Firm Name "Sycip, Salazar, Feliciano, Hernandez and Castillo" July 12, 1979)

WHEN APPLICANT MAY NOT REGISTER BECAUSE THE CONTRACT IS MERELY A MORTGAGE

An applicant for registration of title must prove his title and should not rely on the absence or weakness of the evidence of the oppositors. For purposes of prescripition, there is just title when adverse claimant came into possession of the property through one of the modes recognized by law for the acquisition of ownership. Just title must be proved and is never presumed. Mortgage does not constitute just title on the part of the mortgagee since ownership is retained by the mortgagor. When possession is asserted to convert itself into ownership, a new right is sought to be created, and the law becomes more exacting and requires positive proof of title. Applicant failed to present sufficient evidence to prove that he is entitled to register the property. The trial court's findings that since applicant and his father had been continuously paying realty taxes, that fact "constitutes strong corroborating evidence of applicant's adverse possession," does not carry much weight. Mere failure of the owner to pay taxes does not warrant a conclusion that there was abandonment of a right to the property. The payment of taxes on property does not alone constitute sufficient evidence of title. (Reyes v. Sierna, G.R. No. L-28658, October 18, 1979)

COMMERCIAL LAW

INSURANCE: EFFECT OF NON-PAYMENT OF PREMIUM

Insurance is "a contract whereby one undertakes for a consideration to indemnify another against loss, damage, or liability arising from an unkown or contigent event." The consideration is the "premium." The premium must be paid at the time and in the way and manner specified in the policy and, if not so paid, the policy will lapse and be forfeited by its own terms. (Philippine Phoenix Surety and Insurance Co. v. Woodworks, Inc., G.R. No. L-25317, August 6, 1979)

PIERCING THE VEIL OF CORPORATE FICTION

Were we to sustain the theory of petitioners that the trial court acted in excess of jurisdiction or abuse of discretion amounting to lack of jurisdiction in deciding Civil Case No.6326, as a case for partition when the defendant therein, Tiang Milling and Plantation Company Inc. as registered owner asserted ownership of the assets and properties involved in the litigation which theory must necessarily be based on the assumption that said assets and properties of Tiang Milling and Plantation Company Inc. now appearing under the name of F. L. Cease Plantation Company as trustee are distinct and separate from the estate of Forest L. Cease to which petitioners and respondents as legal heirs of said Forest L. Cease are equally entitled share and share alike, then the legal fiction of seperate corporate personality shall have been used to delay and ultimately deprive and defraud the respondents of their successional rights to the estate of their deceased father. For Tiaong Milling and Plantation Company shall have been able to extend its corporate existence beyond the period of its charter which lapsed in June, 1958 under the guise and cover of F. L. Cease Plantation Company Inc. as trustee which would be against the law, and said trustee shall have been able to use the assets and properties for the benefit of the petitioners, to the great prejudice and defraudation of private respondents. Hence, it becomes necessary and imperative to pierce the corporate veil. (Cease v. CA, G. R. No. L-33172, October 18, 1979)

CRIMINAL LAW

CONVICTION UNDER PD NO. 9

The decree is one of those issued by the President to further the ends for which Martial Law was declared, that is to repel, or at least to prevent the spread of rebellion, insurrection, lawless violence, sedition, criminality, chaos, and public disorder. In other words, the **raison d'etre** for PD 9 is primarily linked with the political purposes for which Proclamation No. 1081 was proclaimed.

In this light, an element surfaces as essential for conviction under PD 9—and that is, that the carrying of the prohibited weapon was made in connection with the crime of subversion, rebellion, insurrection, lawless violence, criminality, chaos, and public disorder mentioned in Proclamation No. 1081. Absent this essential element, as in this case, an acquittal must follow. (Bermudez v. CA, G. R. No. L-4712, July 30, 1979)

RAPE

Article 335 of the RPC, as amended, imposes the death penalty "when by reason or on the occasion of the rape, a homicide is committed." The instant case presents a novel, reverse situation (analogous to rape accompanying a robbery) where the rape was committed on the occasion of the murder, that is to say, when the female victim of a murderous assault was at death's door, she was raped.

Since the victim herein was already at the threshold of death when she was ravished, that bestiality may be regarded as a form of **ignominy** causing disgrace or as a form of cruelty which aggravated the murder because it was unnecessary to the commission thereof and was a manifest outrage on the victim's person. (People v. Laspardas, G.R. N. L-46146, October 23, 1979)

ROBBERY WITH HOMICIDE

The rule is that where the original design comprehends robbery in a dwelling, and homicide is perpetrated with a view to the consumation of the robbery, the crime committed is the complex offense of robbery with homicide even though homicide precedes the robbery by an appreciable time. If the original design was not to commit robbery but robbery was committed after the homicide as an afterthought, the criminal acts should be viewed as constitutive of two distinct offenses and not as a single complex offense. (People v. Toling, G.R. No. L-28548, July 13, 1979)

LABOR LAW

JURISDICTION OF THE BUREAU OF LABOR RELATIONS

The issue is whether it was legal and proper for the director of Labor Relations to refer to the Trade Union Congress of the Philippines (TUCP—a federation of labor unions) the appeal of the associated labor unions in a certification election case.

We hold that the referral of the appeal to the TUCP is glaringly illegal and void. The Labor Code never intended that the Director of Labor Relations should abdicate, delegate, and relinquish his arbitrational prerogatives in favor of a private person or entity or to a federation of trade unions. Such a surrender of official functions is an anomalous, deplorable, and censurable renunciation of the Director's adjudicatory jurisdiction in representation cases. (Ilaw at Buklod ng Mangagawa v. Director of Labor Relations, G.R. No. L-48931, July 16, 1979)

RIGHT OF DEPUTY MINISTER OF LABOR TO DECIDE ON APPEAL QUESTION OF MORAL AND EXEMPLARY DAMAGES

The rule is that where a court has already obtained and is exercising jurisdiction over a controversy, its jurisdiction to proceed to the final determination of the cause is not affected by new legislation placing jurisdiction over such proceeding in another tribunal. The exception to the rule is where the statute expressly provides, or is construed to the effect that it is intended to operate as to actions pending before its enactment. Where a statute changing the jurisdiction of a court has no retrocative effect, it cannot be applied to a case that was pending prior to the enactment of the statute. We find the principle applicable to the case at bar. To require petitioner to file a sperate suit for damages in the regular courts would be to "sanction split jurisdiction, which is prejudicial to the orderly administration of justice." (Note: This case involves the amendment of Article 217 of the Labor Code by P.D. 1367) (Bengzon v. Inciong, L-48706-07, June 29, 1979)

RIGHT OF FOREMAN TO PARTICIPATE IN CERTIFICATION ELECTION

It is essential that the integrity of the collective bargaining process must be maintained. Industrial democracy requires that the workers, and the workers alone, should choose which labor organi-

zation should be the exclusive bargaining representative in a certification election conducted according to law. That is of the very essence of industrial democracy. There must be no introduction of any alien, not necessarily hostile, element. It does appear farfetched to assert that foremen can no longer be considered as integral units of the labor force. It is to be admitted that the powers they exercise are intended to benefit the management in the sense of assuring greater efficiency. It does not follow by any means, that in performing the task assigned to them, they have forfeited their right to be counted on the side of labor and had thereby become mere minions of management. There may be instances where such a deplorable situation may exist. It cannot be assumed, though. It must be proved. Such a proof is lacking in this litigation. It cannot be concluded, therefore, that the institution of collective bargaining as an instrument of assuring protection to labor mandated by the constitution had thereby become impaired or weakened by virtue of allowing the foremen to participate in the certification election. (ULGWP v. Noriel, L-48962-63, June 19, 1979)

POLITICAL LAW

JUSTICIABILITY OF AN ELECTORAL PROTEST

The only issue in the electoral protest case dismissed by respondent judge on the ground of political question is who between protestant—herein petitioners—and protestee—herein respondent Yu—was the duly elected mayor of Rosales, Pangasinan, and legally entitled to enjoy the rights, privileges, and emoluments appurtenant thereto and to discharge the functions, duties, and obligations of the position. If the protestee's election is upheld by the respondent judge, then he continues in office; otherwise, it is the protestant, herein petitioner. That is the only consequence of a resolution of the issue therein involved—a purely justiciable question or controversy as it implies a given right, legally demandable and enforceable, an act or ommission violative of said right, and a remedy granted or sanctioned by law, for said breach of right. Before and after the ratification and effectivity of the new constitution, the nature of the aforesaid issue, as well as the consequences of its resolution by the court, remains the same as the above stated. (Casibang v. Aquino, G.R. No. L-38025, August 20, 1979)

REQUISITE FOR THE VALIDITY OF AN ORDINANCE; WHEN A CRIMINAL PROSECUTION MAY BE ENJOINED

1. An essential requisite for a valid ordinance is, among others, that it must contravene the statute for it is a "fundamental principle that municipal ordinances are inferior in status and subordinate to the laws of the State." Following this general rule, whenever there is a confict between an ordinance and a statute, the ordinance "must give way."

2. On the issue of whether a writ of injunction can restrain the proceedings in Criminal Case No. 31401 the general rule is that "ordinary, criminal prosecution may be blocked by court prohibition or injunction." Exceptions however are allowed in the following instances:

a. for the orderly administration of justice;

b. to prevent the use of the strong arm of the law in an aggressive and vindictive manner;

c. to avoid multiplicity of actions;

d. to afford adequate protection to constitutional rights; and

e. in proper cases, because the statute relied upon is unconstitutional or was held invalid.

The local statute or ordinance at bar being invalid, the exception just cited **obtains** in this case. (Primicias v. Urdaneta, Pangasinan, G.R. No. L-26702, October 18, 1979)

REMEDIAL LAW

ACCION PUBLICIANA WHEN PROPER

Petitioners correctly filed their accion publiciana before the lower court as against respondents' claim that they should instead have filed a summary action for detainer in the municipal court. Having been fully appraised of respondents' refusal to surrender possession and their contrary claim or ownership of the same property, petitioners properly filed their accion publiciana with the Court of First Instance to avoid getting enmeshed in what would certainly have been another jurisdictional dispute, since they would reasonably foresee that if indeed they have filed a summary action for illegal detainer instead in the municipal court, respondents would have contended, contrary to their present claim, that the municipal court is without jurisdiction over the detainer case by virtue of their contrary claim of ownership of the property. (Reyes v. Sta. Maria, L-33213, June 29, 1979)

DISMISSAL OF SPECIAL PROCEEDINGS FOR JUDICIAL ADMINISTRATION WHEN PROPER

The propriety of the dismissal and termination of the special proceedings for judicial administration must be affirmed inspite of its rendition in another related case in view of the established jurispudence which favors partition when judicial administration becomes unnecessary. As observed by the Court of Appeals, the dismissal at first glance is wrong for the reason that what was actually heard was Civil Case No. 6326. The technical consistency, however, is far less in importance than the reason behind the doctrinal rule against placing an estate under administration. Judicial rulings consistently hold the view that when partition is possible, either judicial or extrajudicial, the estate should not be burdened with an administration proceeding without good and compelling reason. When the estate has no creditors or pending obligations to be paid, the beneficiaries in interest are not bound to submit the property to judicial administration which is always long and costly, or to apply for the appointment of an administrator by the event, especially when judicial administration is unnecessary and superflous. (Cease v. CA, G.R. No. L-33172, October 18, 1979)

JURISDICTION: RES JUDICATA

The only question drawn in issue before the Court of Appeals judge in CA-G.R. No. 32259-12 was whether petitioner had the authority to exercise the right of eminent domain. The question regarding the amount of just compensation was expressly reserved by the Court of Appeals for the trial court to determine. Perforce, between the first case wherein such judgment is rendered, and the second case wherein such judgment is invoked, there is identity of parties but there is no identity of causes of action. In such a situation, the judgment is conclusive in the second case only to those matters actually and directly controverted and determined, and not as to matters merely involved therein. To constitute **res judicata,** the right to relief in one suit must rest upon the same question which in essence and substance was litigated and determined in the first suit.

Where a Court of First Instance is divided into several branches, each of the branches is not a court distinct and separate from the others. Jurisdiction is invested in the court, not in the judges, so that when a complaint or information is filed before one branch or judge, jurisdiction does not attach to said branch or judge above, to the exclusion of the others. Trial may be had or proceedings may continue by and before another branch or judge. (Daet v. CA, G.R. No. L-35861, October 18, 1979)

PRELIMINARY INVESTIGATION

Judges of First Instance are vested with authority to conduct a preliminary investigation of a case for libel directly filed with the court since "the lawmaking body, by means of the amendment, (R.A. 4363) never intended to take away the jurisdiction of the proper Court of First Instance to conduct a preliminary investigation in libel cases," and that the "amendment merely sought to strip the ordinary municipal court (not the municipal court of the provincial capital or the city court) of its power to hold a preliminary investigation of written defamations." (Racela v. Bagasao, L-46938, June 14, 1979)

PRELIMINARY INVESTIGATION OF CASES COGNIZABLE BY CITY AND MUNICIPAL COURTS

The contention of petitioners that the procedure that should be followed by city and municipal courts in conducting preliminary investigations of cases cognizable by them in the exercise of their original jurisdiction or concurrently with Courts of First Instance is that prescribed by P.D. 77, as amended by P.D. 911, finds no legal support. The very law itself—P.D. 77, as amended by P.D. 911—states that it applies only to preliminary investigations conducted by fiscals and state prosecutors. The aforesaid decree does not apply to cases filed and triable/cognizable by city and municipal courts, the law applicable thereto being Sec. 10, Rule 112 of the Revised Rules of Court. Construing the said provision, we have held that the accused in a criminal case filed directly and within the jurisdiction of the city or municipal courts is not entitled to a preliminary investigation, the conduct of the preliminary examination prior to the issuance of a warrant for his arrest, as shown by the examination and sworn statements of the complainant and his witnesses, being sufficient to establish whether "there is a reasonable ground to believe that an offense has been committed and the accused is probably guilty thereof, so that warrant of arrest may be issued and the accused held for trial." The reason is that the ensuing trial on the merits takes the place of the preliminary investigation, without needless waste or duplication of time and effort. (Tabil v. Ong, G.R. No. L-46773, July 16, 1979)

WHEN CERTIORARI WOULD NOT LIE

The issue is resolved by application to the Rules of Court. Rule 65, Section 1 provides, interalia that when any tribunal, exercising judicial functions, has acted without or in excess of its jurisdiction, or with grave abuse of discretion, and there is no appeal, nor any plain, speedy, and adequate remedy in the ordinary source of law,

a person aggrieved thereby may file a verified petition for certiorari. Thus, there are two conditions that militate against the grant of a petition for certiorari: firstly, when there is an appeal; or secondly, when there is a plain, speedy, and adequate remedy available—under law. Since in this case there was an appeal, by the plain terms of Rule 65 (1), certiorari cannot be granted. (Enriquez v. Rivera, L-48948, June 19 1979)

WHEN EVIDENCE FOR THE PROSECUTION TO BE PRESENTED

The trial court committed an irregularity in promulgating judgment on the two accused in open court immediately after they had pleaded guilty and then later on requiring the prosecution to present evidence.

However, that irregularity does not justify the setting aside of the judgment of conviction which is supported by the judicial and extra-judicial confessions of the accused and by other evidence. Trial judges are advised not to follow the erroneous reverse procedure adopted by the trial judge in this case. It is not correct to sentence the accused to death immediately after he had pleaded guilty and then to require the prosecutor to present evidence.

The evidence of the prosecutor should be presented after arraignment. The judgment should be rendered and promulgated after the fiscal has presented his evidence and after the trial court has ascertained that the defense is not presenting any evidence. (People v. Dumdum, Jr., G.R. No. L-35279, July 30, 1979)

WHEN MOTION FOR INTERVENTION NOT PROPER

From the particular facts and circumstances of the case at bar, we are satisfied that the respondent judge has not abused his discretion in denying petitioner's motion to intervene. We agree with the holding of the respondent court that since movant Ivor Robart Dayton Gibson appears to be only one of several re-insurers of the risks and liabilities assumed by Malayan Insurance Co., Inc., it is highly probable that the other re-insurers may likewise intervene. The record shows that aside from the petitions there are 63 others syndicate members of Lloyds, 26 companies in the "I.L.U." group holding a 34.705% reinsurance interest and the 2 "other companies" holding the balance of the reinsurances—as listed in annex "A", sur-rejoinder to Lepanto's rejoinder, pp. 136-138, Records. The high probability that there are other re-insurers like the petitioners herein that may likewise intervene if the latter's motion is granted is not an arbitrary assumption of the court. Considering petitioner's assertion that he will have the opportunity to show, among others, that the losses and damages purportedly sustained by Lepanto occured not from the perils of the seas but from the perils of the ships; that Lepanto is not the real party in interest; that it has no cause of action; and neither has it complied with its obligations under the policy which makes the filing of the complaint premature if petitioner is allowed to intervene, we hold that there is good and sufficient basis for the court a quo to declare that the trial between Lepanto and Malayan would definitely be disrupted and would certainly unduly delay the proceedings between the parties especially at the stage where Lepanto had already rested its case and that the issue would also be compounded as more parties and more matters will have to be litigated. In other words, the court's discretion is justified and reasonable. (Ivor Robert Dayton Gibson v. Revilla, G.R. No. L-41432, July 30, 1979)

RECENT LEGISLATIONS

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POLITICAL LAW

Presidential Decree 1627

amends Sec. 8 of Batas Pambansa Blg. 20, entitled "An Act Providing for the Organization of the Sangguniang Pampook in each of Regions 9 and 12 x x x." Formerly, the Sangguniang Pampook were supposed to initially convene upon the call of the President (Prime Minister) **within 60 days from** the proclamation of a majority of the members of the Sangguniang Pampook. By virtue of the amendatory Decree, the Sangguniang Pampook shall now initially convene upon call of the President (Prime Minister) **on such a date as he may deem proper and expedient.**
Done July 6, 1979.
(75 O. G. 6244)

Batas Pambansa Blg. 39

known as the "Foreign Agents Act of 1979" and enacted for reasons of national security, it regulates the activities of foreign agents and requires them to register and to disclose their political activities in the Philippines. The term **foreign agent,** under the Act includes "any person who acts or agrees to act as political consultant, public rela-