

Title: **\*\*Sefyan Abdelhakim Mohamed vs. Republic of the Philippines: A Case on the Strict Compliance in the Process of Naturalization\*\***

**### Facts:**

Sefyan Abdelhakim Mohamed, a Sudanese national and convention refugee, married to a Filipino citizen, applied for Philippine citizenship. He initially filed a Declaration of Intention in 2006, followed by a Supplemental Declaration in 2007 to include an alternative name he was also known as. Subsequently, he filed his Petition for Naturalization. After various proceedings and submitting evidence of his compliance with the naturalization laws, the RTC granted his application in 2009. However, the sequence of events encountered complications, including Mohamed's motion to take his oath as a Filipino citizen, opposed by the OSG citing procedural missteps. Eventually, his motion was granted, and he took the oath in 2012. This was challenged by the OSG at the CA, leading to a decision reversing the RTC's ruling due to insufficient evidence and procedural issues. Mohamed's subsequent appeal brought the matter to the Supreme Court.

**### Issues:**

1. Whether the filing of the Supplemental Declaration of Intention after stating an alternate name requires restarting the one-year period mandated before filing a Petition for Naturalization.
2. Whether the evidence presented by Mohamed was sufficient to establish his qualifications for naturalization.
3. Whether Mohamed's premature oath of allegiance has legal force and effect.

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

1. **\*\*On the Declaration of Intention\*\***: The Supreme Court affirmed the decision of the Court of Appeals, holding that the change introduced in the supplemental declaration was substantial, thus necessitating a fresh one-year period before the filing of the Petition for Naturalization. This is in line with the necessity of giving the State adequate time to investigate an applicant's qualifications.
2. **\*\*On the Sufficiency of Evidence\*\***: The Court found the evidence and testimonies presented by Mohamed's witnesses to be insufficient. The requirement for substantial and credible evidence to prove compliance with the qualifications and disqualifications for naturalization was not met.
3. **\*\*On the Oath of Allegiance\*\***: The Supreme Court concurred with the lower court's

findings that Mohamed's oath of allegiance was administered prematurely and is thus void. This upholds the principle that the naturalization process is strictly regulated, and each step must be precisely followed.

### ### Doctrine:

The Supreme Court reiterates that the right to obtain citizenship by naturalization is a statutory privilege that demands strict compliance with the law. The process is governed by exacting standards, and each step, from the filing of the Declaration of Intention to the administration of the Oath of Allegiance, is critical to the resolution of a naturalization case.

### ### Class Notes:

- **Key Elements for Naturalization**:

- Mandatory one-year waiting period after the Declaration of Intention before filing the Petition for Naturalization.
- Substantial and credible evidence of qualifications and absence of disqualifications.
- Strict adherence to the procedural steps, including the correctly timed administration of the Oath of Allegiance.

- **Legal Statutes**:

- Commonwealth Act No. 473, as amended by Republic Act No. 530, outlines the process and requirements for obtaining Philippine citizenship by naturalization.

- **Application and Interpretation**: This case exemplifies the critical nature of strict adherence to statutory requirements in naturalization petitions. It underscores the importance of accuracy and completeness in documentary submissions and the vital role of the waiting period in allowing the government to conduct a thorough investigation.

### ### Historical Background:

This decision aligns with previous jurisprudence emphasizing the discretionary and privileged nature of naturalization. It serves as a reinforcement of the principle that obtaining Philippine citizenship through naturalization is not a right but a privilege, necessitating rigorous compliance with prescribed legal procedures and requirements.