

****Title:**** Napoleon E. Sanciango vs. The Honorable Jose A. Roño et al.

****Facts:****

The case centers around Napoleon E. Sanciango, who held an appointive position as a member of the Sangguniang Panlungsod of Ozamiz City. This position was by virtue of his election as President of the Association of Barangay Councils (ABC) of Ozamiz City. On March 27, 1984, Sanciango filed his Certificate of Candidacy for the Batasan Pambansa elections scheduled for May 14, 1984, representing the Mindanao Alliance for Misamis Occidental but was unsuccessful.

Following the elections, Sanciango sought to resume his duties in the Sangguniang Panlungsod, invoking Section 13(2) of Batas Pambansa Blg. 697 which states that local elective officials, upon filing a certificate of candidacy, are considered on forced leave of absence from office. However, the Minister of Local Government, Jose A. Roño, ruled that Sanciango, being an appointive official, ceased to hold his position upon filing his candidacy, as per Section 13(1) of the aforementioned law.

Sanciango contested this ruling in the Supreme Court, arguing that Section 13(2) does not distinguish between elective and appointive barangay officials, implying that his move to run for the Batasan Pambansa should have placed him on forced leave, rather than terminating his Sangguniang Panlungsod membership.

****Issues:****

1. Whether an appointive member of the Sangguniang Panlungsod, who runs for the position of Mambabatas Pambansa, should be considered as resigned or on forced leave of absence upon filing of their Certificate of Candidacy.
2. The application of the provisions of Section 13 of Batas Pambansa Blg. 697 to the petitioner's circumstances.

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

The Supreme Court denied Sanciango's petition, affirming that as an appointive official, he ceased to hold his position upon filing his candidacy for the Batasan Pambansa election in 1984. The Court distinguished between the first part of Section 13, which applies to public appointive officials and explicitly causes them to cease holding their positions upon candidacy filing, and the second part, which applies to local elective officials, putting them on forced leave of absence.

****Doctrine:****

This case reiterates the doctrine that public appointive officials, including appointive members of the Sangguniang Panlungsod who file their certificates of candidacy for elections, ipso facto, cease to hold their appointive office as stipulated under Section 13(1) of Batas Pambansa Blg. 697. In contrast, local elective officials are placed on forced leave of absence as per Section 13(2) of the same law.

****Class Notes:****

1. Distinction between appointive and elective officials in the context of running for public office: Appointive officials cease their positions upon candidacy filing, whereas elective officials are placed on forced leave of absence.
2. Statutory Construction: When a statute admits of more than one construction, the construction must promote the purpose and object of the statute.
3. Application of the Equal Protection Clause: Laws must apply equally to all those within its scope without favoritism or discrimination.

****Historical Background:****

This case sheds light on the intricacies of the legal framework governing the political and electoral landscape of the Philippines during the mid-1980s. It highlights the regulations imposed on public officials, distinguishing between their rights and obligations based on their status as either elective or appointive. This distinction profoundly impacts how political participation and career continuity for public servants are navigated within the legal and electoral systems of the Philippines.