Title:
Lokin Jr. vs. COMELEC and The House of Representatives: A Case on the Validity of COMELEC's Authority to Implement Rules for Party-List Nominee Substitution

Facts:
This case arose from the participation of the Citizens' Battle Against Corruption (CIBAC) in the May 14, 2007, elections under the party-list system. CIBAC, through its president Emmanuel Joel J. Villanueva, originally nominated five individuals, including petitioner Luis K. Lokin Jr. CIBAC later submitted an amended list, withdrawing the nominations of Lokin and two others, and substituting them with Armi Jane R. Borje among others.

Despite garnering enough votes for additional seats, CIBAC's motion to proclaim Lokin as its second nominee was opposed, and the COMELEC, through various resolutions, held the proclamation of nominees with pending disputes in abeyance. Ultimately, the COMELEC approved the amendment of CIBAC's list of nominees, which led to the oath-taking of Cinchona C. Cruz-Gonzales as CIBAC's representative instead of Lokin.

Lokin filed petitions for certiorari and mandamus in the Supreme Court, assailing both COMELEC's act of approving the substitution of nominees post-elections and the constitutionality of COMELEC's implementing rules allowing such substitution.

Issues:
1. Does the Supreme Court have jurisdiction over this controversy?
2. Is Lokin guilty of forum shopping for filing both a petition for mandamus and a petition for certiorari?
3. Is Section 13 of COMELEC Resolution No. 7804, which allows party-list nominee substitution not written in R.A. No. 7941, unconstitutional?
4. Did COMELEC commit grave abuse of discretion in approving the substitution of CIBAC nominees and ruling on issues deemed intra-corporate in nature?

Court's Decision:
The Supreme Court ruled in favor of Lokin. It affirmed its jurisdiction over the case, rejecting COMELEC's contention that the issue falls under the HRET's jurisdiction since it neither involved an election protest nor a quo warranto action. The Court also found Lokin not guilty of forum shopping, as each petition sought distinct reliefs based on different actionable grounds.

The Court declared Section 13 of Resolution No. 7804 unconstitutional for extending the

grounds for nominee substitution beyond what was provided in R.A. No. 7941 (Party-List System Act). Therefore, COMELEC's decision based on said resolution was annulled, including the proclamation of Cruz-Gonzales. Lokin was ordered to be proclaimed as a party-list representative of CIBAC.

Doctrine:
The decision reiterated that administrative rules or regulations cannot amend, extend, or in any way modify the law they seek to implement. An administrative agency possesses limited authority strictly within the bounds prescribed by the law. If an implementing rule contravenes the statute it is designed to implement, it is void.

Class Notes:
– **Jurisdiction Over Electoral Contests:** The Supreme Court has jurisdiction to review COMELEC decisions via a petition for certiorari under Rule 65, not limited by the elected official's assumption of office.
– **Forum Shopping:** Filing multiple suits for the same cause with the aim of getting a favorable judgment constitutes forum shopping, which is prohibited. However, distinct actions with different reliefs based on different grounds do not.
– **Implementing Rules and Regulations:** Administrative agencies can issue rules to implement statutes, but these rules must not exceed or modify statutory provisions.
– **Substitution of Party-List Nominees:** Per R.A. No. 7941, substitution after the list's submission to COMELEC is allowed only in cases of death, written withdrawal by the nominee, or incapacitation.

Historical Background:
The case underscores the evolving landscape of the party-list system in the Philippines and raises critical questions regarding the limits of administrative discretion, statutory interpretation, and the balance between the autonomy of political parties and the electoral process's integrity.