

Title:

Baytan et al. vs. The Commission on Elections (COMLEC)

Facts:

The case originated when Reynato Baytan, Reynaldo Baytan, and Adrian Baytan (petitioners) attempted to register for the May 1998 elections on June 15, 1997. Guided by Roberto Ignacio, the newly-elected Barangay Captain, they registered in Precinct No. 83-A of Barangay 18, Cavite City. Doubting the correctness of their precinct due to unfamiliar registrants, they discovered their residence actually laid within Barangay 28's jurisdiction. Consequently, on June 22, 1997, they registered anew in Precinct 129-A of Barangay 28. Intent on correcting their mistake, the petitioners sent a letter dated August 21, 1997, to the COMELEC Assistant Executive Director and the COMELEC Registrar of Cavite City, highlighting their predicament and seeking guidance on canceling their previous registration.

On September 16, 1997, the Election Officer of Cavite City, upon reviewing the petitioners' Voters Registration Records, forwarded them to Provincial Election Supervisor Atty. Juanito V. Ravanzo for evaluation, who recommended prosecuting the petitioners for double registration. The COMELEC en banc, in its Minute Resolution No. 00-2281 dated November 9, 2000, affirmed Ravanzo's recommendation, directing its Law Department to file criminal cases against the petitioners. Despite the petitioners' motion for reconsideration, the COMELEC en banc, in a resolution dated June 3, 2002, reaffirmed its earlier stance, leading to this instant petition.

Issues:

1. Whether the COMELEC en banc committed grave abuse of discretion in prosecuting the petitioners for double registration despite their alleged lack of intent.
2. Whether the COMELEC rightly disregarded the petitioners' August 21, 1997 letter as substantial compliance with the law for cancellation of previous registration.
3. Whether the COMELEC en banc violated the Constitution by assuming original jurisdiction of the case.

Court's Decision:

The Supreme Court held that the petition lacked merit. Analyzing issue by issue:

1. ****Intent and Substantial Compliance****: The Court found no abuse of discretion by the COMELEC in directing the prosecution of the petitioners for double registration. The

offense of double registration is malum prohibitum, where intent is irrelevant. The petitioners clearly registered twice without canceling their previous registration, establishing probable cause for their prosecution.

2. **Letter as Substantial Compliance**: The Court ruled that the petitioners' letter, being sent after their second registration and after the act of double registration was already reported, could not be considered as an application for cancellation of previous registration.

3. **COMLEC en banc Jurisdiction**: The Court clarified that the COMELEC's assumption of original jurisdiction did not violate the Constitution. The constitutional provision requiring election cases to be first decided in division applies only to the COMELEC's quasi-judicial functions, not to administrative actions like conducting preliminary investigations into election offenses.

Doctrine:

The Supreme Court reiterated the doctrine that in cases of malum prohibitum crimes, intent is inconsequential. Additionally, it clarified the scope of the constitutional requirement for the COMELEC to decide cases first in division, emphasizing that it applies to the COMELEC's exercise of quasi-judicial powers and not to administrative functions like preliminary investigations.

Class Notes:

- Malum Prohibitum Crimes**: In such crimes, the wrongful act is criminalized strictly by legislation, and intent does not bear on guilt.
- COMELEC's Powers**: COMELEC possesses both administrative and quasi-judicial functions. Its administrative action of conducting preliminary investigations can be decided en banc without contravening the Constitution.
- Election Offenses**: Election offenses, as defined under the Omnibus Election Code (particularly regarding voter registration), emphasize adherence to procedural requirements over the registrant's intent.

Historical Background:

This case illustrates the stringent regulations the COMELEC enforces to ensure the integrity of electoral processes, specifically addressing the pitfalls and legal consequences surrounding voter registration in the Philippines. The decision underscores the bifurcated administrative and quasi-judicial roles of the COMELEC, emphasizing strict compliance with election laws and the non-importance of intent in committing certain election offenses like

double registration.