

****Title:** Regina Ongsiako Reyes vs. Commission on Elections and Joseph Socorro B. Tan: A Case Analysis**

****Facts:****

Regina Ongsiako Reyes filed a Certificate of Candidacy for the position of Member of the House of Representatives for the lone congressional district of Marinduque. Joseph Socorro B. Tan, a respondent in this case, challenged Reyes' candidacy, claiming she did not possess the requisite qualifications due to her alleged lack of Filipino citizenship and residency. The COMELEC First Division canceled Reyes' candidacy, which the COMELEC En Banc later affirmed.

Despite the COMELEC's resolution dated May 14, 2013, affirming the cancellation of her candidacy, Reyes was proclaimed the winner of the congressional seat on May 18, 2013. Reyes then took her oath of office. The COMELEC issued a Certificate of Finality on June 5, 2013, rendering its decision final and executory. Reyes petitioned the Supreme Court (SC) to annul the COMELEC's decision and recognize the jurisdiction of the House of Representatives Electoral Tribunal (HRET) over the matter, arguing that her proclamation and oath-taking vested exclusive jurisdiction in the HRET.

****Issues:****

1. Whether the COMELEC had jurisdiction over the qualifications of Reyes after her proclamation and oath-taking as a Member of the House of Representatives.
2. Whether Reyes' proclamation was valid despite the COMELEC's prior resolution canceling her candidacy.
3. Whether the COMELEC committed grave abuse of discretion in cancelling Reyes' candidacy based on her failure to substantiate her Filipino citizenship and residency.

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

The Court denied Reyes' motion for reconsideration and maintained that the COMELEC had jurisdiction over the matter before the proclamation. The Court asserted that the COMELEC's decision to cancel Reyes' candidacy was based on substantial evidence that she failed to renounce her American citizenship as required by law. The Court further held that Reyes' proclamation was without basis since it was made when there was already a standing cancellation of her certificate of candidacy. The Court found no grave abuse of discretion on the part of the COMELEC.

****Doctrine:****

The Supreme Court reaffirmed the doctrine that the jurisdiction of the COMELEC in matters relating to the qualifications of candidates does not end with the proclamation of the winner. A candidate's proclamation does not cure the defects of ineligibility, especially when the decision on the matter had been rendered before the proclamation.

****Class Notes:****

1. Jurisdiction Over Candidate Qualification: The COMELEC retains jurisdiction over challenges to a candidate's qualifications until the moment the candidate is officially proclaimed and assumes office, at which point jurisdiction transfers to the respective electoral tribunal.
2. Provisional Proclamation: A proclamation made while there are standing legal challenges to a candidate's eligibility, especially regarding citizenship and residency requirements, does not necessarily confer legitimacy or remove the COMELEC's jurisdiction to decide on such matters.
3. Grave Abuse of Discretion: When administrative bodies like the COMELEC base their decisions on substantial evidence, their actions are generally not considered a grave abuse of discretion.

****Historical Background:****

The case highlights ongoing challenges in Philippine electoral laws regarding candidate eligibility, particularly on issues of dual citizenship. The legal proceedings underscore the tension between administrative bodies (COMELEC) and legislative electoral tribunals (HRET) in determining jurisdiction over election-related disputes. This case reiterates the importance of clear renunciation of foreign citizenship for Filipinos holding dual citizenship who wish to run for public office, as mandated by Philippine law.