

Title:

Galido vs. Commission on Elections and Galeon

Facts:

Perfecto V. Galido and Saturnino R. Galeon contested in the 18 January 1988 local elections for the mayorship of Garcia-Hernandez, Bohol, Philippines. Galido was initially proclaimed the winner by the Municipal Board of Canvassers. Galeon filed an election protest in the Regional Trial Court (RTC) of Bohol, which upheld Galido's victory by an eleven-vote margin. Galeon appealed to the Commission on Elections (COMELEC), which found in its favor by a five-vote lead, attributing the shift to fifteen ballots with a "C" after "Galido" being ruled as marked and invalid. Galido's subsequent motion for reconsideration was denied by COMELEC en banc.

Galido's first petition to the Supreme Court was dismissed for procedural non-compliance. Undeterred, he filed a second petition (G.R. No. 95346), leading to a temporary restraining order against the COMELEC decision and Galeon's assumption of office. Galeon sought dismissal, arguing COMELEC decisions on municipal elections are final and unappealable, the case involved factual matters outside Supreme Court jurisdiction, and a similar petition had been previously dismissed. The Supreme Court lifted its temporary restraining order, adjudging the matter moot as Galeon had already taken office.

Issues:

1. Whether COMELEC decisions in local electoral contests are appealable to the Supreme Court.
2. Whether the COMELEC committed grave abuse of discretion in declaring the ballots with "C" after Galido's name as invalid.
3. The procedural propriety of dismissal and refileing of Galido's petition for certiorari.

Court's Decision:

The Supreme Court dismissed Galido's petition. It clarified that while decisions of COMELEC in local electoral contests are final and unappealable, this does not preclude a judicial review through a special civil action of certiorari for grave abuse of discretion. However, it found no such abuse in COMELEC's decision. The discretion in applying precedent and evaluating evidence lies with COMELEC, and the Court did not find this discretion to have been exercised erroneously.

Doctrine:

The resolution underscored the doctrine that decisions of the COMELEC concerning electoral contests for municipal and barangay offices are indeed final, executory, and not appealable. However, a special civil action of certiorari remains an available recourse should there be a showing of grave abuse of discretion.

Class Notes:

- **Finality of COMELEC Decisions:** Electoral contests' decisions at the municipal level by COMELEC are final and not open to appeal, reinforcing COMELEC's broad powers in electoral matters.
- **Special Civil Action of Certiorari:** Despite the elections' decisions' finality, a window remains for judicial review through certiorari under grave abuse of discretion.
- **Marked Ballots:** The COMELEC possesses discretion in evaluating evidence to classify ballots as marked, demonstrating its vital role in ensuring electoral integrity.
- **Procedural Compliance:** Adherence to procedural requirements is paramount in seeking judicial review, as evidenced by the initial dismissal of Galido's first petition.

Historical Background:

The galvanizing theme of this case within the broader historical narrative accentuates the critical balance between the finality of electoral determinations by administrative bodies like COMELEC and the judiciary's oversight to rectify potential overreaches, all within the colorful and oft-contentious milieu of Philippine local politics. This duality serves not only as a safeguard against abuse but also as a testament to the evolving legal frameworks that address the complexities of democratic processes.