

Title: Antonio Bengson III vs. House of Representatives Electoral Tribunal and Teodoro C. Cruz

Facts: The case revolves around the citizenship status of Teodoro C. Cruz, a vital qualification for being a member of the House of Representatives of the Philippines as per the constitutional requirement that “no person shall be a Member of the House of Representatives unless he is a natural-born citizen.” Born to Filipino parents in San Clemente, Tarlac, Cruz initially lost his Filipino citizenship upon enlisting in the United States Marine Corps and swearing allegiance to the United States, further affirmed by his naturalization as a U.S. citizen. He later reacquired Philippine citizenship through repatriation under Republic Act No. 2630, ran for, and was elected as the Representative of the Second District of Pangasinan in 1998. Antonio Bengson III, the petitioner, challenged Cruz’s qualification, arguing that Cruz, having lost his Filipino citizenship, could not be considered a natural-born citizen upon his reacquisition of Philippine citizenship.

The House of Representatives Electoral Tribunal (HRET) ruled in favor of Cruz, which led Bengson to file a petition for certiorari with the Supreme Court, arguing that the HRET committed grave abuse of discretion by considering Cruz a natural-born citizen despite the loss and subsequent reacquisition of his Filipino citizenship.

Issues: The central legal issue is whether Teodoro C. Cruz, after losing his Philippine citizenship and later reacquiring it through repatriation, qualifies as a natural-born Filipino citizen, thus meeting the constitutional requirement for membership in the House of Representatives.

Court’s Decision: The Supreme Court dismissed the petition, upholding the HRET’s decision that Cruz is a natural-born Filipino citizen. The Court delved into the definition and intent of the constitutional provision regarding natural-born citizenship, emphasizing that natural-born citizens are those citizens of the Philippines from birth without having to perform any act to acquire or perfect their Philippine citizenship. It highlighted that Filipino citizens who have lost their citizenship and later reacquired it in the manner provided by law (naturalization, repatriation, or direct act of Congress) are still considered natural-born provided they did not undergo the process of naturalization to reacquire their citizenship. As Cruz’s reacquisition of Philippine citizenship by repatriation did not entail naturalization but merely taking an oath of allegiance, the Court ruled he is deemed to have recovered his original status as a natural-born citizen.

Doctrine: The Supreme Court established that repatriation results in the recovery of the

original nationality, meaning if a person was originally a natural-born citizen before losing his Philippine citizenship, his repatriation would restore his former status as a natural-born Filipino.

Class Notes:

1. Natural-born Citizen: Defined under Article IV, Section 2 of the 1987 Philippine Constitution as those who are citizens of the Philippines from birth without having to perform any act to acquire or perfect their Philippine citizenship.
2. Repatriation: A mode of reacquiring lost Philippine citizenship for those who have rendered service to, or accepted commission in, the armed forces of a foreign country, among other conditions. It involves taking an oath of allegiance to the Republic and registering it. As per R.A. No. 2630, it allows one to recover his original nationality, thus restoring his status as a natural-born citizen if such was the case before the loss of citizenship.

Historical Background: The case underscores the evolving interpretation of citizenship within the Philippine legal system, particularly regarding those who lose and subsequently reacquire their citizenship. This situation is juxtaposed against the backdrop of global mobility and the resulting complexities of national allegiance. It reflects the judiciary's attempt to reconcile the strict constitutional mandates on citizenship for elective office eligibility with the realities of modern Filipino diaspora experiences.