

Title: AKBAYAN-YOUTH et al. vs. COMMISSION ON ELECTIONS (COMELEC)

Facts:

The case involves petitions consolidated before the Supreme Court of the Philippines, questioning the Commission on Elections (COMELEC)'s denial of a request for special registration of new voters aged 18 to 21 before the May 14, 2001, General Elections. The petitioners argued that approximately four million youth were unable to register by the December 27, 2000, deadline set by COMELEC under Republic Act No. 8189. After the deadline, a public hearing was held, led by Senator Raul Roco, to discuss possibly extending the voter registration period. COMELEC, however, issued Resolution No. 3584 on February 8, 2001, denying the request for additional registration days on grounds that no registration should occur within 120 days before an election as stipulated in Section 8 of R.A. 8189. Subsequently, two petitions were filed before the Supreme Court seeking to annul COMELEC's resolution and to mandate a special registration of new voters.

Issues:

1. Whether COMELEC committed grave abuse of discretion in issuing Resolution No. 3584 dated February 8, 2001.
2. Whether the Supreme Court can order COMELEC to conduct a special registration of new voters during the period between COMELEC's imposed December 27, 2000 deadline and the May 14, 2001 general elections.

Court's Decision:

The Supreme Court denied the petitions, ruling that the COMELEC did not commit grave abuse of discretion in denying the request for additional registration days. It affirmed that the legal prohibition against conducting registration 120 days before an election is clear and must be respected. The Court also held that it could not compel COMELEC to conduct special registration through a writ of mandamus, as the authority to decide on matters concerning voter registration lies within COMELEC's discretion and mandate.

Doctrine:

The Court reiterated the principle that the exercise of the right of suffrage, while fundamental, is subject to existing laws regulating the electoral process. Specifically, the Court highlighted the legislative intent behind R.A. 8189, emphasizing the need for an orderly and systematic voter registration process to uphold the integrity of elections.

Class Notes:

1. The right of suffrage is subject to procedural requirements such as voter registration.
2. COMELEC has broad discretion in administering and enforcing election laws, including voter registration.
3. Legal provisions setting deadlines for voter registration and prohibiting registration within specific periods before an election (R.A. 8189, Sec. 8) are binding and must be observed.
4. The Supreme Court's power to issue writs of mandamus does not extend to compelling election-related bodies to perform acts that require discretion.

Historical Background:

The case reflects the tension between the principles of ensuring broad electoral participation and maintaining the procedural integrity of elections. It arises within the context of the Philippine legal framework governing elections, which sees periodic reforms and amendments to respond to the evolving demands of the electorate and the challenges of administering elections in a populous and diverse nation.