

Title: Estrella v. Commission on Elections (COMELEC) and Rolando F. Salvador

Facts:

Romeo M. Estrella petitioned for certiorari to nullify the COMELEC's Status Quo Ante Order dated November 5, 2003. This order mandated the parties to revert to the status quo before the Regional Trial Court of Malolos issued a writ of execution enforcing its decision, which declared Estrella as the duly elected mayor of Baliwag, Bulacan. In the COMELEC En Banc where the order was issued, five commissioners participated, with four voting for the order while Commissioner Bora dissented. A complication arose because Commissioner Lantion, who had previously inhibited himself in a related case before the Second Division (SPR No. 21-2002) due to a motion by Estrella but later stated his inhibition was case-specific and not applicable to the En Banc proceedings. This raised procedural questions when the Supreme Court initially nullified the COMELEC's order, citing an insufficient quorum because Lantion's prior inhibition should exclude his participation, leaving the En Banc without the required majority vote as per COMELEC rules.

Issues:

1. Can a COMELEC Commissioner's inhibition in Division-level proceedings be considered non-applicable to En Banc deliberations?
2. Does a decision in the COMELEC En Banc session require a majority vote of all its members or just those who participated?
3. Is the COMELEC En Banc's Status Quo Ante Order valid considering the voting controversy and procedural rules?

Court's Decision:

The Supreme Court granted Estrella's petition, thereby nullifying the COMELEC En Banc's Status Quo Ante Order. It was determined that Commissioner Lantion's piecemeal participation due to his prior voluntary inhibition was legally improper and could not be condoned. The Court emphasized that a COMELEC decision or order must attain the majority vote of "all its members," not just the majority of those who participated and deliberated, aligning with the Constitution's requirements. It reversed the principle applied in the Cua case, underscoring that "all its members" necessitates the inclusion of every member regardless of their participation in the deliberations, thereby clarifying the interpretation of majority vote within the commission.

Doctrine:

The doctrine established in this case clarifies that for the COMELEC En Banc to validly

decide on a case or matter, the decision requires a majority vote of all its members as stipulated in the Constitution, and not merely the majority of those present and voting. It rejects the notion of piecemeal inhibition, reinforcing the integrity and collective responsibility of the Commission's decision-making process.

Class Notes:

Key Elements:

- Legal interpretation of "majority vote" within constitutional bodies like the COMELEC.
- Role of individual commissioners' participation in both Division and En Banc proceedings.
- Statutory provision on quorum and voting requirements as per COMELEC rules versus constitutional mandates.

Relevant Statutes:

- Section 5(a) of the COMELEC Rules of Procedure, mirroring Section 7, Article IX-A of the 1987 Philippine Constitution, requires a majority vote of all its members for decision-making.
- The principle that statutory and procedural interpretations should align with the explicit wording and intention of the Constitution, particularly regarding decision-making processes in constitutional bodies.

Application in Case:

The Supreme Court's decision in *Estrella v. COMELEC* established a significant clarification on the procedural integrity required in COMELEC decisions, mandating unequivocal adherence to constitutional language over procedural rules or previous case law interpretations.

Historical Background:

This case reflects the evolving understanding and application of constitutional and procedural laws in the context of electoral disputes in the Philippines. It underscores the judiciary's role in interpreting procedural ambiguities in the light of constitutional directives, ensuring that electoral bodies like the COMELEC adhere to principles of fairness, transparency, and collective decision-making.