Title:
Halili, et al. vs. Commission on Elections, et al.

Facts:
Marino P. Morales served as Mayor of Mabalacat, Pampanga, from 1 July 2007 to 30 June 2016, through three consecutive terms. During his second term, the Municipality of Mabalacat was converted into a component city by Republic Act No. 10164 passed on 15 May 2012. Morales filed his Certificate of Candidacy (COC) for the 2016 elections, which respondent Pyra Lucas challenged in the Commission on Elections (COMELEC), citing Morales's ineligibility due to the three-term limit rule. Morales countered, arguing that the conversion interrupted his continuity of service. The City Board of Canvassers proclaimed Morales elected after the 2016 election, leading to further motions by Crisostomo Garbo and Christian C. Halili, each seeking Morales's disqualification and their respective entitlements to the mayoral position.

These politically charged events unfolded through a series of legal challenges across COMELEC's divisions and eventually reached the Supreme Court of the Philippines, which addressed the core issues regarding term limits, eligibility, and the effects of municipal to city conversions on elected officials' terms.

Issues:
The Supreme Court was faced with determining:
1. Whether the conversion of the Municipality of Mabalacat to a city interrupted Morales's term for the application of the three-term limit rule.
2. Whether Morales's COC for the 2016 elections should be cancelled based on false material representation regarding his eligibility.
3. The appropriate party to assume the mayoral position following the cancellation of Morales's COC.

Court's Decision:
The Court ruled unanimously against Morales, affirming his ineligibility to run for a fourth term. It found the conversion of Mabalacat from a municipality to a city did not serve as an interruption that would reset the term count under the three-term limit rule. Morales's assertion about the new city's broader territory, resources, and population failed to establish a distinction significant enough to interrupt his term continuity. The Court also dismissed the legitimacy of Morales's COC, deeming it void ab initio due to the false material representation of eligibility, effectively turning all votes for Morales into stray

votes and allowing for the proclamation of Garbo, the candidate with the next highest votes, as mayor. This decision leaned heavily on established jurisprudence regarding term limits and material representation in COC filings.

Doctrine:
The Supreme Court reiterated the doctrine that the conversion of a municipality into a city does not constitute an interruption in the incumbent official's continuity of service for the purpose of circumventing the three-term limit rule stated in the Constitution and the Local Government Code. Moreover, a COC filed with false material representation regarding the candidate's eligibility is void ab initio.

Class Notes:
– The three-term limit rule for elective local officials means an official cannot serve more than three consecutive terms in the same position, with the conversion of a municipality into a city not constituting an interruption of service.
– A Certificate of Candidacy containing false material representation about a candidate's eligibility is considered void from the start, rendering any votes for such a candidate as stray.
– Succession laws do not apply to the vacancy caused by the disqualification of a candidate whose COC was considered void ab initio; instead, the eligible candidate with the next highest number of votes assumes office.

Historical Background:
The case highlights the intricacies of Philippine electoral law and the strict interpretation of term limits for local officials. It underscores the judiciary's role in upholding constitutional provisions designed to prevent political monopolization and ensure that elected positions remain accessible to a broader pool of qualified candidates. This decision also illustrates the importance of the integrity of COC filings and the consequences of misrepresentations therein.