

Title: Jovit Buella y Abalain vs. People of the Philippines: The Exclusion of Bladed Instruments from the Definition of Deadly Weapons in COMELEC Resolution No. 10015

Facts:

This case revolves around the constitutionality of Section 1(a), Rule II in relation to Section 1(f), Rule I of COMELEC Resolution No. 10015, which included “all types of bladed instruments” within the prohibited deadly weapons during the election period of the May 9, 2016 National and Local Elections. Jovit Buella, alongside Matea Obay, Jeffrey Esperas, Ruel Valencia, and Joel Pastorizo (collectively referred to as the accused), were charged with illegal possession of bladed instruments without a COMELEC-issued permit for carrying such weapons outside their residences during the election period.

Upon their arraignment, all accused pleaded not guilty. Obay and Esperas then filed a Motion to Dismiss, challenging the constitutionality of the COMELEC Resolution. The RTC of Naga City, invoking its power of judicial review, declared the questioned sections of COMELEC Resolution No. 10015 unconstitutional, resulting in the dismissal of the charges against all accused. The prosecution’s motion for reconsideration was denied.

The People of the Philippines, through the OSG, then filed a Petition for Certiorari with the CA, arguing that the RTC gravely abused its discretion in its rulings. The CA granted the petition, annulled the RTC’s decisions, and remanded the cases for further proceedings. Only Buella appealed to the Supreme Court (SC).

Issues:

1. Whether the CA erred in finding that the petitioner lacked the requisite personality to challenge COMELEC Resolution No. 10015.
2. Whether the CA erred in holding that Judge Soliman M. Santos, Jr. should not have heard and decided on the issue of the constitutionality of COMELEC Resolution No. 10015.

Court’s Decision:

The SC reversed the CA’s decision, holding that the attack on the constitutionality of COMELEC Resolution No. 10015 constituted a direct challenge and was properly within the scope of judicial review. It found that all requisites for judicial review were present. The Court declared that bladed instruments are excluded from the term “deadly weapons” in COMELEC Resolution No. 10015, hence dismissing the criminal cases against Buella and the others.

Doctrine:

The SC reiterated that penal laws are to be construed strictly against the State and liberally in favor of the accused, and that administrative issuances must not override but must remain consistent with the law they seek to apply and implement.

Class Notes:

1. Strict Construction of Penal Laws: Penal provisions are interpreted strictly against the State and liberally in favor of the accused.
2. Requisites for Judicial Review: Actual case or controversy, standing, raised at the earliest opportunity, and necessity for decision resolution.
3. Role of Preambles in Statutory Construction: The preamble of a statute can offer insight into legislative intent but cannot enlarge or confer powers or cure inherent defects in the statute.
4. Principle of Stare Decisis: Judicial decisions form part of the legal system of the Philippines, binding lower courts to follow Supreme Court rulings.

Historical Background:

This case underscores the evolving interpretation of election laws in the Philippines, particularly regarding the power of the COMELEC to regulate objects considered as deadly weapons during election periods. It also reflects on the judiciary's role in reviewing administrative resolutions for constitutional compliance.