Title:

Espirita N. Acosta vs. The Commission on Elections, Judge Genoveva Coching Maramba, and Raymundo I. Rivera, G.R. No. 134792, April 17, 1999

Facts:

1. Election and Initial Proclamation:
– On May 12, 1997, Espirita N. Acosta and Raymundo I. Rivera contested for the position of Punong Barangay in Barangay Sobol, San Fabian, Pangasinan.
– Acosta was initially proclaimed the winner with a margin of four votes over Rivera.

2. Election Protest:
– On May 15, 1997, Rivera filed an election protest with the Municipal Circuit Trial Court (MCTC) of San Fabian-San Jacinto, Pangasinan.
– Rivera alleged misreading, non-reading, mistallying, and misappreciation of ballots in Precincts Nos. 22-A, 22-A-1, 22-B, and 22-B-1, and sought a recount.

3. Court Summons and Motion for Time to File Answer:
– The MCTC summoned Acosta, who, on May 19, 1997, filed a Motion for Time to File Answer.
– On May 21, 1997, the MCTC denied Acosta's motion, found the protest sufficient in form and substance, and ordered the municipal election officials to present the ballot boxes and election documents.

4. Petition to COMELEC:
– On May 29, 1997, Acosta filed a petition for certiorari and prohibition with the Commission on Elections (COMELEC), questioning the MCTC's May 21, 1997, order (docketed as SPR No. 13-97).

5. MCTC Decision:
– On May 30, 1997, the MCTC declared that Rivera garnered 408 votes over Acosta's 405, nullified Acosta's proclamation, and declared Rivera the duly elected Punong Barangay.
– Acosta filed a notice of appeal on June 11, 1997, which the MCTC granted, docketing it as UNDK No. 5-97 with COMELEC.

6. COMELEC En Banc Resolution:
– On December 2, 1997, COMELEC dismissed Acosta's petition for lack of merit and affirmed both the MCTC's May 21, 1997, order and the May 30, 1997, decision.
– Aggrieved, Acosta then sought relief from the Supreme Court.

Issues:
1. **Whether COMELEC exceeded its authority by affirming the MCTC's decision dated May 30, 1997, in SPR No. 13-97, which pertained only to an interlocutory order.**
2. **Whether COMELEC's issuance of the resolution en banc, rather than in division, violated constitutional mandates.**

Court's Decision:
1. COMELEC's Exceeding of Authority:
– The Supreme Court held that COMELEC exceeded its authority by affirming the MCTC's decision in SPR No. 13-97, which was intended to contest only the interlocutory order of May 21, 1997.
– The election case was elevated to COMELEC through an appeal (UNDK No. 5-97) that wasn't consolidated with SPR No. 13-97, thus invalidating the COMELEC's decision to include the May 30, 1997, ruling in its December 2, 1997, resolution.

2. Violation of Constitutional Mandate:
– The Supreme Court found that COMELEC had violated Article IX-C, Section 3 of the 1987 Philippine Constitution which mandates that election cases be heard and decided in a division, not by the en banc, unless they are motions for reconsideration of division's decisions.
– The resolution issued by the COMELEC en banc in SPR No. 13-97 was invalid due to procedural lapse.

Doctrine:
a. COMELEC's Jurisdictional Limits:
– COMELEC must respect the limits of its authority as established by the Constitution and procedural rules, particularly when handling interlocutory orders and decisions.

b. Procedural Adherence:
– Election disputes must adhere strictly to the Constitutional directive on adjudication being initially handled by divisions of COMELEC before any en banc resolution.

Class Notes:
Key Concepts:
1. **Jurisdictional Limits:** Importance of jurisdictional boundaries for administrative bodies like the COMELEC.
2. **Due Process:** Ensuring procedural due process includes proper adjudication by

authorized judicial bodies.

3. **Article IX-C, Section 3 of 1987 Constitution:** Election cases must initially be decided in a division, with en banc handling reconsideration requests only.

Relevant Statutes:

1. **1987 Constitution, Article IX-C, Section 3:** Mandates procedural requirements for COMELEC operations in election cases.

2. **Rule on Certiorari (Rules of Court):** Addresses procedural requirements for seeking judicial review of lower court decisions.

Historical Background:

This case emerged from a municipal election dispute, reflecting broader procedural fidelity within Philippine electoral jurisprudence. It underscores continual efforts to balance swift dispute resolution while maintaining procedural rigor critical for upholding democratic processes.

By addressing jurisdiction issues and procedural adherence, the case exemplifies the critical review processes aimed at maintaining the integrity and fairness of elections in the context of Philippine constitutional law.