

****Title:****

Petronila S. Rulloda vs. Commission on Elections (COMELEC), et al.

****Facts:****

1. ****Events Leading to the Case:****

- On July 15, 2002, barangay elections were held in Barangay Sto. Tomas, San Jacinto, Pangasinan with Romeo N. Rulloda and Remegio L. Placido as candidates for Barangay Chairman.
- Romeo N. Rulloda passed away due to a heart attack on June 22, 2002.
- His widow, Petronila “Betty” Rulloda, sought permission from the Commission on Elections (COMELEC) on June 25, 2002, to run as candidate in place of her deceased husband. Her letter was supported by signatures from the electorate.

2. ****COMELEC Actions:****

- Election Officer Ludivico L. Asuncion issued a directive to the Board of Canvassers to disregard votes for Petronila Rulloda by labelling them as “NOT COUNTED” if her name appeared on the ballot.
- Despite Rulloda’s watchers tallying 516 votes for her compared to 290 votes for Remegio Placido, Placido was proclaimed Barangay Chairman by the Board of Canvassers.

3. ****Resolution No. 5217:****

- Prior to the elections, COMELEC denied the substitution requests of both Andres Perez Manalaysay and Petronila Rulloda through Resolution No. 5217 on July 13, 2002, citing COMELEC’s Resolution No. 4801 which banned substitution of candidates for Barangay and Sangguniang Kabataan elections.

4. ****Petition for Certiorari:****

- Petronila Rulloda filed a petition for certiorari to annul Section 9 of Resolution No. 4801 and Resolution No. 5217, to nullify Placido’s proclamation, and to declare herself as the duly elected Barangay Chairman.

****Issues:****

1. ****Legal Validity of Section 9 of Resolution No. 4801:****

- Whether Section 9 of Resolution No. 4801, which prohibits substitution of candidates in barangay elections, is valid.

2. ****Resolution No. 5217 Compliance with Election Procedures:****

- Whether COMELEC’s Resolution No. 5217 which denied Petronila Rulloda’s substitution

request and votes, violated election law and procedures.

3. **Proclamation Legitimacy:**

- The validity of Remegio Placido's proclamation as the Barangay Chairman despite the plurality of votes in favor of Petronila Rulloda.

Court's Decision:

1. **Substitution of Candidates (Section 9 of Resolution No. 4801):**

- The Supreme Court nullified Section 9, emphasizing that the absence of a specific provision for the substitution in barangay elections does not imply a prohibition. Election laws should facilitate the expression of the electorate's will, and denying substitution would frustrate this purpose.

2. **Resolution No. 5217:**

- The Court declared Resolution No. 5217 invalid as applied to Petronila Rulloda. Her request to run as substitute was considered her certificate of candidacy, showing that she met the procedural requirement to be a candidate.

3. **Proclamation of Remegio Placido:**

- The Court set aside the proclamation of Remegio Placido due to the plurality of votes in favor of Petronila Rulloda. Placido's claim that he was the sole candidate was refuted based on COMELEC's records treating Petronila's letter as a certificate of candidacy.

Doctrine:

1. **Popular Will in Election Laws:**

- Elections are the embodiment of the popular will, and laws governing elections should not defeat but give effect to the electorate's choice.

2. **Substitution in Non-Partisan Elections:**

- The lack of explicit provisions for substitution in barangay elections cannot be inferred as prohibitive, indicating the prioritization of democratic choice over procedural technicalities.

Class Notes:

1. **Key Elements/Concepts:**

- **Substitution of Candidates:** Important in all elections to respect electorates' will.

- **Technicalities vs. Popular Will:** Technical procedures should not override the expressed will of the voters.

2. **Relevant Legal Provisions:**

- **Section 77, Omnibus Elections Code:** Substitution of a candidate due to death, disqualification, or withdrawal.
- **Resolution No. 4801, COMELEC:** Contains guidelines for elections including a controversial prohibition on substitution in barangay elections.

3. **Application:**

- The Supreme Court's decision prioritizes the electoral will over procedural rules that could invalidate legitimate electoral results.

Historical Background:

- This case addresses legal interpretations in local elections in the Philippines, highlighting the procedural and substantive principles aimed at ensuring democratic legitimacy. It reflects the judiciary's role in safeguarding democratic processes in the face of administrative obstacles, reinforcing the primacy of voter's choice as a cornerstone of democracy.