

Title

Milagros E. Amores vs. House of Representatives Electoral Tribunal and Emmanuel Joel J. Villanueva

Facts

Milagros E. Amores filed a Petition for Quo Warranto questioning the legality of the assumption of office by Emmanuel Joel J. Villanueva as a representative of the Citizens' Battle Against Corruption (CIBAC) party-list in the House of Representatives. Here is the step-by-step progression of the case:

- Nomination and Election**: Villanueva was nominated by CIBAC for a House seat representing the youth sector. At the time of the filing of his Certificates of Nomination and Acceptance, Villanueva was already 31 years old, surpassing the age limit of 30 as stipulated in Section 9 of Republic Act (RA) No. 7941.
- Change of Sectoral Affiliation**: Villanueva later changed his affiliation from the youth sector to the overseas Filipino workers and their families sector but did not effect this change at least six months prior to the May 14, 2007 elections, contrary to Section 15 of RA No. 7941.
- Issued Proclamations**: CIBAC was partially proclaimed as entitled to at least one seat in the House of Representatives through NBC Resolution No. 07-60 dated July 9, 2007. Villanueva assumed office on July 10, 2007, without a formal proclamation by the Commission on Elections (COMELEC), receiving his Certificate of Proclamation only on December 13, 2007.
- Procedural Posture**:
 - Initial Petition**: Amores filed her quo warranto petition on October 17, 2007, alleging Villanueva's disqualification on the grounds mentioned above.
 - HRET Decision**: The House of Representatives Electoral Tribunal (HRET) dismissed the petition on May 14, 2009, and denied the Motion for Reconsideration on August 6, 2009, ruling that the petition was untimely and that Sections 9 and 15 of RA No. 7941 did not apply.
 - Supreme Court Petition**: Amores filed a Petition for Certiorari with the Supreme Court, contending grave abuse of discretion by the HRET.

Issues

- Timeliness of the Petition for Quo Warranto**: Whether Amores' petition was

dismissible for having been filed beyond the 10-day reglementary period.

2. **Application of Sections 9 and 15 of RA No. 7941**: Whether the age limit for youth sector nominees (Section 9) and the six-month requirement for changes in sectoral affiliation (Section 15) applied to Villanueva.

Court's Decision

The Supreme Court analyzed and resolved each legal issue as follows:

1. **Timeliness of the Petition**:

- The Supreme Court ruled that the HRET committed grave abuse of discretion in considering the petition untimely. NBC Resolution No. 07-60 was not a formal proclamation of Villanueva himself per Section 13 of RA No. 7941, which requires that representatives be proclaimed based on the list submitted by their respective parties. Since the exact date of Villanueva's proclamation was not disclosed, the Court decided to overlook the technicality and ruled on the merits.

- As qualifications for public office are continuing requirements, Amores' challenge could be filed at any time during Villanueva's term.

2. **Application of Sections 9 and 15 of RA No. 7941**:

- **Section 9 (Age Requirement)**: The Court found no textual support for HRET's interpretation limiting the application of Section 9 to the first three congressional terms after 1987. The law clearly states that youth nominees must be between 25 and 30 years of age on election day, applying to all youth sector nominees vying for party-list representative seats.

- **Section 15 (Change of Affiliation)**: The Court ruled that Section 15 applies to Villanueva's change of affiliation from the youth sector to the overseas Filipino workers and their families sector. The provision covers changes within the same party and multi-sectoral organizations like CIBAC. Villanueva did not make this change at least six months before the elections.

Conclusively, Villanueva was not qualified to be a nominee for either sector in the May 2007 elections.

Doctrine

1. **Timeliness of Quo Warranto Petitions**: Proclamations must be formal and specific to an individual representative as required by law. Proclamations or resolutions affecting party-list seats generally do not count.

2. **Qualifications as Continuing Requirements**: Qualifications for holding public office must be met not only at the time of election or assumption but during the entire tenure.

Class Notes

- **Section 9 of RA No. 7941**: Youth sector nominees must be 25-30 years of age on election day. This requirement is continuous and applies to all youth sector positions under the Party-List System Act.
- **Section 15 of RA No. 7941**: Changes in sectoral affiliation must occur at least six months before elections. Changes within the same party still require compliance with this rule.
- **Verba legis principle**: When the law's language is clear and unambiguous, it must be applied as written without interpretation.

Historical Background

The case emerged within the context of the Philippines' Party-List System Act (RA No. 7941), designed to enhance representation of marginalized and underrepresented sectors in the political landscape. The legislation intended strict qualifications to ensure appropriate sectoral representation while preserving democratic value and procedure in the electoral process. This case reiterates the rigorous standards and continuous nature of compliance required for public office positions, especially under the party-list system.