

Title: Honorata A. Labay vs. People of the Philippines

Facts:

- **June 22, 1997:** Honorata A. Labay (petitioner) registered as a voter in COMELEC-Batangas City.
- She voted in the 1998 and 2001 elections.
- **December 26, 2001:** Labay filed another application for new registration in COMELEC-Calapan City, falsely declaring she was not a registered voter elsewhere.
- **July 2, 2002:** She requested COMELEC-Batangas City to cancel her previous registration.
- **July 8, 2002:** COMELEC-Batangas City confirmed the cancellation of her previous voter registration.
- **July 15, 2002:** Labay won a barangay chairman election in Calapan City, which led her opponent to file criminal charges against her including the present case.

Procedural Posture:

1. **RTC Conviction:** Labay was charged and convicted of violating Section 10(j) in relation to Sections 45(j) and 46 of RA 8189. Sentenced to one year imprisonment, disqualified from holding public office, and deprived of the right to vote.
2. **Appeal to CA:** CA affirmed the RTC's decision.
3. **Motion for Reconsideration:** Denied by the CA.
4. **Petition for Review on Certiorari to the Supreme Court:** Filed under Rule 45 by Labay.

Issues:

1. **Whether the petitioner was convicted of the same offense charged in the Information.**
2. **Whether the petitioner was duly informed of the cause of the accusation against her.**
3. **Whether Section 45(j) of RA 8189 is unconstitutional.**

Court's Decision:

- **First and Second Issues: Conviction and Information Adequacy**
- The Supreme Court emphasized that in a petition for review on certiorari under Rule 45, it generally decides only questions of law.
- It found no merit in Labay's claim that the Information was deficient or that she was not sufficiently informed of the charges. The Information clearly indicated the elements constituting the offense under Section 10(j) in relation to Sections 45(j) and 46 of RA 8189.
- The Court ruled that the Information provided Labay with reasonable certainty of the offense charged, specifically her failure to disclose her prior voter registration from

Batangas City during her new registration in Calapan City.

- **Third Issue: Constitutionality of Section 45(j) of RA 8189**

- The Supreme Court referenced the precedent set in *Spouses Romualdez v. Commission on Elections* and upheld the constitutionality of Section 45(j) of RA 8189.

- The “void-for-vagueness” doctrine was found inapplicable here as Section 45(j) is clear and not ambiguous. The phraseology used has been employed in multiple laws which have not been declared unconstitutional.

- The Court asserted that every statute is presumed valid unless a clear and unequivocal breach of the Constitution is demonstrated, which Labay failed to do.

Doctrine:

- **Malum Prohibitum** - Intention is immaterial for offenses classified as malum prohibitum, such as double registration.

- **Valid Information** - The crime should be described in the Information with enough clarity to apprise the accused of the specific charges.

- **Void-for-Vagueness Doctrine** - This doctrine applies more stringently in First Amendment contexts, and less so in criminal statutes unless there is a clear breach of constitutional provisions.

Class Notes:

- **Key Elements of Election Offense:**

- **Section 10(j), RA 8189:** Applicants must state they are not registered voters elsewhere.

- **Section 45(j), RA 8189:** Any violation of the Act constitutes an election offense.

- **Section 46, RA 8189:** Punishment includes imprisonment (1 to 6 years), disqualification from holding public office, and deprivation of suffrage.

- **Important Principles:**

- **Sufficiency of Information:** Must contain specific allegations detailing the offense for an accused to prepare a defense.

- **Constitutional Validity:** Presumption of constitutionality applies to statutory language unless demonstrably vague and ambiguous.

Historical Background:

- **Voter’s Registration Act of 1996 (RA 8189):** Enacted to ensure transparency and integrity in the voter registration process and to penalize fraudulent practices, like double registration, which undermine the election system’s credibility.

- **Judicial Scrutiny:** This case reflects the Philippine judiciary's active role in upholding electoral laws aimed at preventing election fraud and ensuring voters' honesty and compliance during the registration process.