

Title:

Juanito C. Pilar vs. Commission on Elections

Facts:

1. **Filing of Certificate of Candidacy**: On March 22, 1992, Juanito C. Pilar filed his certificate of candidacy for member of the Sangguniang Panlalawigan in Isabela.
2. **Withdrawal of Candidacy**: Just three days later, on March 25, 1992, Pilar withdrew his certificate.
3. **Resolutions on Fines**: The COMELEC issued Resolution Nos. 93-2654 (Nov. 3, 1993) and 94-0065 (Feb. 13, 1994), fining Pilar PHP 10,000 for failing to file his statement of contributions and expenditures.
4. **Motion for Reconsideration**: On Feb. 24, 1994, COMELEC denied Pilar's motion for reconsideration (M.R. No. 94-0594).
5. **Appeal to COMELEC En Banc**: Pilar appealed to the COMELEC en banc (UND No. 94-040), which was denied in a resolution dated Apr. 28, 1994.
6. **Petition for Certiorari**: Pilar then filed a petition for certiorari under Rule 65 before the Supreme Court, challenging the COMELEC's resolution.

Issues:

1. **Liability Despite Withdrawal**: Whether a person who withdrew his candidacy is still required to file a statement of contributions and expenditures.
2. **Interpretation of "Candidate"**: Whether the law's mandate on filing such statements applies to those who do not actively participate in the election.

Court's Decision:

1. **Legal Obligation to File**: The Supreme Court ruled that under Section 14 of R.A. No. 7166, every candidate must file a statement, regardless of whether they pursued their campaign or withdrew their candidacy. The law does not distinguish between candidates who continued their campaigns and those who withdrew.
2. **Mandatory Language**: The use of the term "shall" in the statute establishes it as a mandatory requirement.
3. **ENSURING Transparency**: The requirement serves a public interest in ensuring transparency in the electoral process, which includes even those who initially filed as candidates but later withdrew.
4. **Enforceability**: The court affirmed that COMELEC's enforcement, including the imposition of fines, was within its regulatory duties.
5. **Dismissal of Petition**: The Supreme Court dismissed the petition, thereby upholding

the COMELEC's resolutions imposing the fine on Pilar.

Doctrine:

The decision reiterates that every individual who files a certificate of candidacy is mandated by law to file a statement of contributions and expenditures, even if they later withdraw their candidacy. This requirement aims to uphold transparency and integrity in the electoral process and assignments of public office.

Class Notes:

Key Elements:

- **R.A. No. 7166, Sec. 14**: Mandates all candidates to file statements of contributions and expenses.
- **Mandatory Interpretation**: Use of "shall" implies it is a non-negotiable duty.
- **Ubi lex non distinguit nec nos distinguere debemos**: Where the law does not distinguish, neither should the courts.
- **Administrative Fine**: Range from PHP 1,000 to PHP 30,000, enforceable by writ of execution.
- **Perspective on 'Candidate'**: Includes anyone who filed for candidacy, regardless of their subsequent withdrawal or active participation.
- **Public Policy Justification**: Ensures clean and transparent electoral processes.

Historical Background:

The case occurred in the context of widespread reforms aimed at promoting transparency and accountability in Philippine electoral processes. R.A. No. 7166 was part of these broader reforms intended to synchronize national and local elections and improve the integrity of elections by regulating campaign financing. The COMELEC resolutions underpinning this case reflect an era of tightening electoral regulations post-Marcos dictatorship, aimed at ensuring clean and transparent elections to forestall the fraud and corruption endemic in earlier periods.