

Title:

COCOFED-Philippine Coconut Producers Federation, Inc. v. Commission on Elections, G.R. No. 205357

Facts:

****Step-by-Step Events:****

1. ****May 29, 2012**** - COCOFED-Philippine Coconut Producers Federation, Inc. (COCOFED) manifested its intent to participate in the party-list elections scheduled for May 13, 2013, and submitted two nominees.
2. ****August 23, 2012**** - The COMELEC conducted a summary hearing to determine compliance of party-list groups, including COCOFED, with legal requirements.
3. ****November 7, 2012**** - The COMELEC cancelled COCOFED's registration for failing to comply with legal requisites, notably the submission of fewer than five nominees.
4. ****December 4, 2012**** - COCOFED submitted additional nominees for compliance.
5. ****April 2, 2013**** - Supreme Court remanded petitions, including COCOFED's, to the COMELEC for re-evaluation under new parameters set in Atong Paglaum decision.
6. ****May 10, 2013**** - COMELEC reaffirmed cancellation of COCOFED's registration citing continuing failure to submit the required number of nominees.
7. ****May 13, 2013**** - Elections took place, and COCOFED's name remained on the ballot due to a status quo ante order.
8. ****May 20, 2013**** - COCOFED requested admission of additional nominees after elections.
9. ****May 24, 2013**** - COMELEC declared COCOFED's noncompliance as final and executory.

****Procedural Posture:****

COCOFED filed a petition for certiorari with the Supreme Court challenging COMELEC's decisions, claiming violations of due process and equal protection under the law. COCOFED sought to annul the COMELEC's resolutions and have its votes counted.

Issues:

1. ****Due Process Violation****: Whether COMELEC violated COCOFED's due process rights by not conducting a summary hearing as mandated by the Supreme Court in Atong Paglaum.
2. ****Compliance with RA No. 7941****: Whether COCOFED's failure to submit a list of not less than five nominees warranted cancellation of its registration.
3. ****Equal Protection Violation****: Whether COMELEC's actions violated COCOFED's right

to equal protection given that other party-list groups with similar deficiencies were allowed to participate.

4. **Practical Use of the Petition**: Whether the case had become moot given that the votes for COCOFED were counted and tallied as of May 29, 2013.

Court's Decision:

1. **Mootness**: The Court held that the petition was not moot because the cancellation of COCOFED's registration had broader implications for future elections.

2. **Due Process**: The Court found no due process violation. COMELEC had informed all parties of the requirement well before the elections, and COCOFED's failure to submit a complete list by the deadline was noted during the August 2012 hearings.

3. **Compliance with RA No. 7941**: The Court upheld COMELEC's decision, underscoring the mandatory nature of submitting a list of at least five nominees as per Section 8 of RA 7941. COCOFED's noncompliance was a valid basis for cancellation.

4. **Equal Protection**: The Court found no equal protection violation. Differences in decisions regarding other party-list groups were based on distinct facts and circumstances.

Doctrine:

1. **Mandatory Compliance**: Compliance with procedural requirements, such as the submission of a list of not less than five nominees under Section 8 of RA No. 7941, is mandatory for the participation and registration of party-list groups.

2. **Quasi-Administrative Function**: The COMELEC's administrative actions in registration and compliance checks do not necessitate the same procedural rigor as judicial or quasi-judicial functions.

3. **Due Process**: Notification of procedural requirements and opportunities for compliance suffice for due process in administrative proceedings.

Class Notes:

- **Section 8, RA No. 7941**: Requires submission of a list of at least five nominees from which party-list representatives shall be chosen.

- **Quasi-Administrative Nature**: Registration and compliance operations by COMELEC are administrative, focusing on adherence to procedural standards without strict judicial formalities.

- **Due Process**: Ensuring that parties are informed and given reasonable opportunity to comply with election laws suffices to meet due process requirements.
- **Equal Protection**: Different factual scenarios justify different administrative treatments among similarly situated parties by COMELEC.

Historical Background:

COCOFED's challenge was set against a backdrop where the Philippine electoral system had undergone significant judicial scrutiny, especially in interpreting and applying RA No. 7941 governing party-list systems. The Atong Paglaum case was crucial in setting guidelines for the qualifications and compliance of party-list groups, impacting COCOFED's petition. The era saw an active judiciary attempting to balance legislative intent, administrative regulations, and constitutional mandates to ensure representative democracy.