

Title: Aggabao and Navarro vs. Commission on Elections (2022)

Facts:

1. **Initial Filings and Conflict:**

- On October 4, 2021, Amelita S. Navarro filed her Certificate of Candidacy (COC) for Mayor of Santiago City, Isabela, claiming nomination by Partido Reporma, with attached Certificate of Nomination and Acceptance (CONA) signed by Senator Panfilo Lacson.
- On October 8, 2021, Christopher G. Ayson also filed a COC for the same position, presenting a CONA purportedly signed by Senator Lacson.

2. **Dispute and Withdrawals:**

- Senator Lacson, on learning of Ayson's claim, sent a letter to the COMELEC Law Department on November 6, 2021, disowning Ayson's CONA and affirming Navarro as the official candidate.
- Navarro withdrew her candidacy for Mayor on November 9, 2021, opting instead to run for Vice-Mayor, with Aggabao filing his COC as her substitute.

3. **COMELEC Actions and Decisions:**

- On November 10, 2021, COMELEC declared Navarro an independent candidate under Section 15 of COMELEC Resolution No. 10717, as Partido Reporma had supposedly nominated two candidates.
- Aggabao, on November 12, 2021, argued that Navarro's withdrawal validated his substitution, supported by further letters from Senator Lacson reiterating the invalidity of Ayson's nomination.

4. **Procedural and Subsequent Developments:**

- The COMELEC maintained its stance on Navarro's status in its December 22, 2021 communication, affecting Aggabao's COC.
- Despite a Temporary Restraining Order (TRO) from the Supreme Court issued on January 25, 2022, COMELEC proceeded with election preparations, citing timelines.

Issues:

1. Did the COMELEC commit grave abuse of discretion by declaring Navarro an independent candidate and denying Aggabao's substitution without due process?
2. Was the application of Section 15 of COMELEC Resolution No. 10717 appropriate in this case, particularly given Senator Lacson's disavowal of Ayson's CONA?

3. Should the Supreme Court intervene given the potential mootness due to the conclusion of the May 9, 2022 elections? ^{Digest)}

Court's Decision:

1. **Exercise of Quasi-Judicial Powers:**

- The Supreme Court ruled that the COMELEC failed to perform its quasi-judicial duty by not resolving the legal controversy over the CONAs, particularly ignoring Senator Lacson's certifications and failing to conduct hearings.

2. **Due Process Violations:**

- The Court found the COMELEC's actions deprived the petitioners of due process and declared the relevant Documents No. 21-3973, No. 21-7467, and No. 22-0176 nullified for failing to adhere to procedural due process.

3. **Case Mootness:**

- While acknowledging the election's conclusion rendered some issues moot, the Court addressed underlying principles to guide future actions, emphasizing due process in disputes involving party nominations and candidate substitutions.

Doctrine:

- The case reiterates the principle of due process in COMELEC's quasi-judicial functions, especially when multiple CONAs and conflict in party endorsements arise.
- It upholds the necessity for notice and hearing in adjudicative proceedings involving candidate disqualifications and substitutions.

Class Notes:

- **Election Code Provisions:** Section 77 and Section 78 of the Omnibus Election Code.
- **Procedural Prescriptions:** Requirement for disputes to be heard by a COMELEC Division, with appeal to the En Banc upon motion for reconsideration.
- **Resolution Adoption:** Due process involves notice, hearings, evidence evaluation—a path overlooked here but essential according to the ruling.

Historical Background:

This case underscores ongoing issues in Philippine electoral processes, particularly the intricate dynamics of party nominations and procedural diligence required from electoral

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bodies like the COMELEC. The decision highlights systemic issues needing rectification to ensure electoral integrity and uphold democratic processes, reflecting the broader context of political party operations and electoral jurisprudence in the country.