

Title: People of the Philippines vs. Hon. Henry B. Basilla, et al.

Facts:

- In May 1987, following congressional elections in Masbate, complaints alleging violations of Section 261 of the Omnibus Election Code were filed with the Office of the Provincial Fiscal of Masbate.

- Three separate complaints were filed:

1. Jolly Fernandez filed a complaint against spouses Jaime and Adoracion Tayong for vote-buying (violation of Section 261, paragraph a-1).

2. Ladislao Bataliran filed a complaint against Salvacion Colambot, also for vote-buying (violation of Section 261, paragraph a-1).

3. PC/Sgt. Arturo Rebaya filed against Melchor Yanson for carrying a deadly weapon (violation of Section 261, paragraph p).

- After a preliminary investigation, the Provincial Fiscal of Masbate filed criminal complaints in the Regional Trial Court of Cataingan, Masbate, against each accused: Criminal Case No. 324 (spouses Tayong), Criminal Case No. 326 (Colambot), and Criminal Case No. 375 (Yanson).

- On October 6, 1987, Judge Henry Basilla dismissed all three cases, arguing that the Commission on Elections (Comelec) had exclusive jurisdiction over such offenses, as the cases were not filed with or prosecuted by Comelec.

- The People moved for reconsideration of Judge Basilla's orders, but the motion was denied.

- The People filed a Petition for Review, claiming grave abuse of discretion by the respondent judge, asserting that Comelec had designated prosecutors to investigate and prosecute such offenses.

Issues:

1. Whether the Commission on Elections (Comelec) had exclusive jurisdiction to investigate and prosecute election offenses without delegation.

2. Whether the deputation of fiscal officers by Comelec was valid for the filing and prosecution of criminal cases related to election offenses.

Court's Decision:

- The Supreme Court granted the Petition for Review, setting aside and annulling Judge Basilla's orders that dismissed the criminal cases.

- The Court held that while Comelec had exclusive jurisdiction over election offenses, it was authorized to delegate this power to other prosecutorial agencies. This authority was

supported by Section 265 of the Omnibus Election Code, the 1987 Constitution, and Executive Order No. 134.

- The Court clarified that the deputation of fiscal officers to investigate and prosecute election offenses was proper and necessary for expeditious handling of such cases, especially given logistical constraints.
- The trial court was ordered to continue the trial of the criminal cases against the respondents.

Doctrine:

- The case reaffirms the authority of Comelec not only to investigate and prosecute election offenses but also to delegate such powers to other prosecuting arms of the government to ensure the effective administration of justice.
- This delegation must comply with the procedural rules established by laws and the Constitution, and deputies act under the supervision of Comelec.

Class Notes:

- Key statutes involved: Section 261 and Section 265 of the Omnibus Election Code; Section 2 (6) and (8) of Article IX-C of the 1987 Constitution.
- The role of deputation: The Comelec's ability to deputize government prosecutorial bodies ensures comprehensive enforcement of election laws, essential for the integrity and credibility of elections.
- The 'exclusive jurisdiction' of Comelec is not an absolute barrier against delegation, allowing for operational flexibility.

Historical Background:

- The case took place in the aftermath of the 1986 EDSA Revolution, a period of significant political transition and electoral reform in the Philippines. The 1987 Constitution aimed to fortify electoral processes, entrusting Comelec with extensive powers to manage and discipline the conduct of elections, yet also allowing for the operational dispensation of its duties through deputized agencies.