

Title:

Coquilla v. Commission on Elections

Facts:

1. **Early Life and Naturalization**:

- Teodulo M. Coquilla was born to Filipino parents on February 17, 1938, in Oras, Eastern Samar.
- In 1965, he joined the United States Navy and later acquired U.S. citizenship.
- During his service in the U.S. Navy, Coquilla made three trips to the Philippines (1970-1973).

2. **Return to the Philippines**:

- After retiring from the U.S. Navy in 1985, Coquilla continued living in the United States.
- On October 15, 1998, he returned to the Philippines and secured a residence certificate.

3. **Repatriation**:

- Coquilla applied for repatriation under R.A. No. 8171, which was approved on November 7, 2000.
- He took an oath as a Philippine citizen on November 10, 2000.

4. **Voter Registration and Candidacy**:

- Registered as a voter of Butnga, Oras, during January 2001.
- Filed a certificate of candidacy on February 27, 2001, claiming two years of residency in Oras.

5. **Challenge from Incumbent Mayor**:

- Neil M. Alvarez challenged Coquilla's candidacy, alleging false residency claims in the certification.
- Despite the challenge, Coquilla won the election on May 14, 2001, by 379 votes and was proclaimed Mayor of Oras.

6. **COMELEC Ruling**:

- On July 19, 2001, the COMELEC's Second Division canceled Coquilla's certificate of candidacy.
- Coquilla filed a motion for reconsideration, which was denied by the COMELEC en banc on January 30, 2002.

7. **Petition to Supreme Court**:

- Coquilla filed a petition for certiorari to reverse the COMELEC's decisions. His main arguments revolved around procedural timelines, jurisdiction post-election, and the legitimacy of his residency claim.

Issues:

1. ****Timeliness and Jurisdiction**:**

- Whether the motion for reconsideration filed by Coquilla suspended the 30-day appeal period to the Supreme Court.
- Whether COMELEC retained jurisdiction to nullify a candidate's certificate of candidacy post-election and proclamation.

2. ****Substantive Residency Requirement**:**

- Whether Coquilla met the one-year residency requirement stipulated under Section 39(a) of the Local Government Code for candidates seeking local office.

3. ****Material Misrepresentation**:**

- Whether Coquilla made a material misrepresentation regarding his residency duration in his certificate of candidacy.

Court's Decision:

****Resolution on Procedural Issues**:**

- The Supreme Court held that Coquilla's motion for reconsideration was filed within the prescribed period and thus validly suspended the 30-day filing period for the petition.
- The COMELEC did not lose jurisdiction post-election and was right to continue hearing the petition because the final resolution was necessary to address qualifications contested prior to the election.

****Decision on Residency Requirement**:**

- The Court ruled that Coquilla did not meet the residency requirements. His residency counted only from November 10, 2000, post-repatriation, falling short of the one-year requirement for the May 14, 2001 general elections.

****Material Misrepresentation**:**

- By stating a two-year residency in his certificate of candidacy, Coquilla materially misrepresented his qualifications. Such misrepresentation warranted the cancellation of his certificate under the Omnibus Election Code.

Doctrine:

1. **Repatriated Citizens and Residency**:

- Domicile or legal residency continuity is lost upon naturalization in a foreign country and is only re-established upon reacquisition of Philippine citizenship.

2. **Material Representation in Candidacy Certificates**:

- False statements regarding essential qualifications, like residency duration, constitute material misrepresentation warranting the document's cancellation (Sections 74 & 78 of the Omnibus Election Code).

Class Notes:

- **Key Elements**:

- **Naturalization**: Loss and reacquisition of citizenship affect legal residence.

- **Residency Requirement**: Candidates must reside in their municipality for at least one year before election day (Sec. 39(a), Local Government Code).

- **Material Misrepresentation**: Falsified information on essential qualifications in a certificate of candidacy is grounds for cancellation.

- **Statutory Provisions**:

- **Section 39(a), R.A. 7160 (Local Government Code)** & **Sections 74 and 78 (Omnibus Election Code)** govern eligibility and material representations in candidacy.

- **R.A. No. 8171**: Provides for repatriation of former natural-born Filipinos.

Historical Background:

The case is contextually set in post-Marcos election reforms in the Philippines aimed at ensuring lawful and fair electoral processes. The Local Government Code passed in 1991 aimed to decentralize governance, enhancing democratization and local autonomy. The meticulous scrutiny of candidates' eligibility by the COMELEC, bolstered by jurisprudence, reflects an ongoing enforcement of rules to preserve electoral integrity in emerging democratic structures post-dictatorship.