

### Title:

Ramon L. Labo, Jr. v. Commission on Elections (COMELEC) and Luis L. Lardizabal

### Facts:

The central issue of this case revolves around the citizenship of Ramon L. Labo, Jr. and his qualification to hold the office of Mayor of Baguio City, Philippines. Labo was elected as mayor, but his qualification was contested due to allegations of his Australian citizenship. The procedural journey began when Labo was proclaimed mayor-elect on January 20, 1988. On January 26, Luis L. Lardizabal filed a petition for quo warranto against Labo but failed to pay the filing fee until February 10, resulting in Labo contending that the petition was filed out of time as per Section 253 of the Omnibus Election Code. The COMELEC handled the petition initially as a pre-proclamation controversy but re-docketed it as a quo warranto proceeding, which Labo argued was out of time and without jurisdiction. The case escalated to the Supreme Court on the basis that the petition's filing fee, paying only after 21 days post-proclamation, voided its timeliness.

### Issues:

1. Whether the COMELEC has jurisdiction to conduct an inquiry into Labo's citizenship as a qualification for his elected position.
2. The timeliness of the quo warranto petition filed against Labo, particularly the relevance of the filing fee payment date.
3. Whether Labo, who is alleged to be an Australian citizen, is qualified to serve as Mayor of Baguio City.

### Court's Decision:

The Supreme Court ruled that the petition for quo warranto was timely filed, considering the procedural complexities and acknowledging that the submission was initially treated as a pre-proclamation controversy, which did not necessitate an immediate payment of the filing fee. On the substantive issue, the Court decisively found Labo to be an Australian citizen, hence disqualifying him from holding the position of mayor. The Court underscored that Philippine citizenship is a paramount requirement for holding public elective office, a criterion that Labo failed to meet. Labo's acts of obtaining Australian citizenship were voluntary and indicative of his renunciation of Philippine citizenship. The Court ordered Labo to vacate the office of the Mayor of Baguio City, emphasizing that citizenship requirements are not mere technicalities but fundamental criteria that ensure allegiance to the Republic of the Philippines.

### Doctrine:

The Supreme Court reiterated constitutional and legal doctrines pertaining to citizenship as a qualification for elective office. It emphasized the imperative that eligibility for public office is predicated on undivided loyalty to the country, embodied in the status of being a citizen. Furthermore, the Court pronounced the principle that the results of an election cannot override constitutional and statutory qualifications for public office, reinforcing the sanctity of the legal criteria over the electorate's choice in cases of disqualification.

### Class Notes:

- **Citizenship Requirement for Elective Public Office**: A fundamental qualification, underscoring allegiance and loyalty to the Republic of the Philippines.
- **Timeliness of Legal Filings**: The importance of meeting procedural deadlines, including the payment of requisite filing fees, although exceptions may apply in consideration of the justice system's intent to resolve substantive issues.
- **Doctrine of Qualifications for Public Office**: Election results do not supersede constitutional and statutory qualifications for holding public office. Eligibility must be established independently of electoral success.
- Relevant Legal Statutes and Doctrines:
  - Omnibus Election Code, Section 253; regarding the timely filing of a quo warranto petition against elected officials.
  - CA No. 63 and PD No. 725; detailing the modes of losing and reacquiring Philippine citizenship.

### Historical Background:

This case is implanted within the context of post-1986 People Power Revolution Philippines, where the integrity of public office and the qualifications of those holding these positions came under increased scrutiny. The legal controversies surrounding Labo's citizenship and his position as mayor reflected broader concerns over national allegiance, foreign influence, and the legal mechanisms to ensure elected officials meet all requisite qualifications, specifically citizenship. The decision is critical in reinforcing the constitutional and legal mandates governing eligibility for public office amidst the Philippines' evolving democratic landscape post-martial law and the restoration of democratic institutions.