

### Title:

Lynette G. Garvida vs. Florencio G. Sales, Jr., et al.: A Case on the Age Qualification for Sangguniang Kabataan Elective Officials

### Facts:

The case centers around Lynette G. Garvida's quest for a position in the Sangguniang Kabataan (SK) of Barangay San Lorenzo, Bangui, Ilocos Norte. The sequence of events began with Garvida's application for registration as a member and voter of the Katipunan ng Kabataan on March 16, 1996. Her application was denied due to her exceeding the age limit as per COMELEC Resolution No. 2824. Garvida's challenge to this denial led her through the Municipal Circuit Trial Court to the COMELEC en banc. Despite her subsequent proclamation as the elected SK chairman, a petition filed against her by Florencio G. Sales, Jr., another candidate, based on her alleged disqualification due to age, prompted the COMELEC en banc to suspend her proclamation.

The case underwent a procedural journey involving appeals and petitions across several legal forums—from the Municipal Circuit Trial Court to the Regional Trial Court, and finally, to the COMELEC where it was handled en banc instead of by a division. This procedural history includes Garvida's certificate of candidacy being initially disapproved due to her age, an appeal that led to its eventual approval, and a petition by Sales to cancel Garvida's candidacy that was decided upon by the COMELEC en banc.

### Issues:

1. Did the COMELEC en banc have jurisdiction to decide on the petition against Garvida's candidacy?
2. Was Garvida eligible to run for the position considering the age requirement stipulated in the COMELEC Resolution No. 2824 and the Local Government Code of 1991?

### Court's Decision:

The Supreme Court ruled that the COMELEC en banc acted without jurisdiction in entertaining the petition against Garvida, highlighting that jurisdiction over such matters lies with the COMELEC sitting in division. Despite this, the Court proceeded to resolve the issue on Garvida's age qualification. It held that Garvida exceeded the age limit for elective SK officials. She was 21 years and approximately 11 months old on election day, surpassing the "not more than 21 years of age" requirement by COMELEC and the Local Government Code. Consequently, the petition against Garvida was granted, and she was declared ineligible to hold the SK chairman position.

### Doctrine:

The case reiterated the doctrine that jurisdiction over a petition to cancel a certificate of candidacy lies with the COMELEC sitting in division, not en banc. It also clarified the age qualification for Sangguniang Kabataan candidates, establishing that an individual must not be more than 21 years old on the day of the election.

### Class Notes:

- Jurisdiction of COMELEC cases must be initially decided by a division, not en banc.
- Age qualification for elective SK officials is strictly “not more than 21 years of age” on election day.
- The difference between the age requirement for membership in the Katipunan ng Kabataan and elective SK officials was underscored.
- Legal qualifications, especially age requirements for election candidates, are matters of public policy and strictly upheld.
- The process of legal remedy involves petitions for inclusion, appeals, and the critical role of jurisdiction in the adjudication of election-related disputes.

### Historical Background:

This case underscores the evolving dynamics and legal scrutiny within the electoral process of the Philippines, especially concerning the youth’s political participation through the Sangguniang Kabataan. The SK system has been a platform for Filipino youth to engage in governance, and this case highlights the legal boundaries and qualifications that underpin this engagement. The Local Government Code of 1991 and subsequent COMELEC resolutions shaping these qualifications reflect the legislative and regulatory efforts to ensure the integrity of youth representation in barangay governance.