

### Title: Naval v. Commission on Elections and Julia, G.R. No. 207851, March 11, 2014

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### ### Facts

#### 1. **Initial Election and Terms**:

- Angel G. Naval was elected as a member of the Sanggunian representing the Second District of Camarines Sur, serving two consecutive terms from 2004 to 2007 and 2007 to 2010.

#### 2. **District Reapportionment**:

- Republic Act No. 9716 was approved on October 12, 2009, changing the legislative districts of Camarines Sur, including renaming and redistributing towns into new districts.  
- As a result, 8 of the 10 towns of the former Second District were reclassified as the Third District.

#### 3. **Subsequent Elections**:

- Naval was re-elected to represent the newly named Third District of the Sanggunian in 2010, and again in 2013.

#### 4. **Challenge to Candidacy**:

- Nelson B. Julia, a rival from the Third District, filed a petition on October 29, 2012, to deny or cancel Naval's Certificate of Candidacy (COC) under Section 78 of the Omnibus Election Code, arguing Naval violated the three-term limit rule.

#### 5. **COMELEC Decisions**:

- March 5, 2013: COMELEC Second Division cancels Naval's COC, declaring he had served three consecutive terms in the same elective office.  
- June 5, 2013: COMELEC en banc denies Naval's motion for reconsideration due to procedural deficiencies and lack of merit.

#### 6. **Petition to the Supreme Court**:

- Naval filed a Petition for Certiorari seeking to annul the COMELEC resolutions.

### ### Issues

1. **Whether Naval has served three consecutive terms in the same government post**.

2. **Impact of district reapportionment on the three-term limit rule**.

3. **Applicability of the three-term limit rule despite electoral district changes**.

**Court's Decision**

**Issue 1: Whether Naval has served three consecutive terms in the same government post**

The Supreme Court affirmed COMELEC's ruling, agreeing Naval had indeed served three consecutive terms (2004-2013) in the same government post, irrespective of the district changes. The rule emphasizes the continuity of service in a particular elective position.

**Issue 2: Impact of district reapportionment on the three-term limit rule**

The apportionment mandated by R.A. No. 9716 merely renamed the districts instead of creating entirely new ones. Courts observed that the new Third District (previously the Second District minus two towns) inherently retains similar electoral and territorial characteristics. This negates Naval's argument of a significant change in the constituency.

**Issue 3: Applicability of the three-term limit rule despite electoral district changes**

The interpretation saw the district changes as nominal, maintaining the underlying continuity necessary for the three-term limit to apply. Reapportionment did not reset the term count. The precedent established in *Latasa v. Commission on Elections* emphasized that the nature and scope of the elected office remain fundamentally the same despite geographic changes, thus supporting the COMELEC's decision.

**Doctrine**

The Court reiterated the inflexible nature of the three-term limit, as established in the Constitution and the Local Government Code. This doctrine prevents the reduction of democratic choices and accumulation of excessive power by terminating an uninterrupted extended stay in the same public office.

**Class Notes**

- **Three-Term Limit Rule**: Article X, Section 8 of the 1987 Constitution, and Section 43(b) of the Local Government Code disallow local officials from serving more than three consecutive terms in the same position.
- **Reapportionment**: Changes in district boundaries should not disrupt the count of terms

served if the constituency, in essence, remains the same.

- **\*\*Material Misrepresentation\*\***: Filing a COC despite known ineligibility constitutes grounds for its cancellation.

### ### Historical Background

This case reflects the Constitutional framers' intent to balance continuous democratic renewal and preventing entrenchment in local government power structures. Amid evolving electoral geographies, critical boundaries were set to ensure the vitality of democratic institutions by stringent interpretation and application of term limits.