

****Case Title:**** Sangguniang Panlungsod ng Valenzuela City vs. Janine Alexandra R. Carlos

****Facts:****

Janine Alexandra R. Carlos was elected as Sangguniang Kabataan (SK) Chairperson of Brgy. Marulas and president of the SK Federation of Valenzuela City on May 22, 2018, becoming an ex-officio member of the Sangguniang Panlungsod. Due to perceived dereliction of duties, including unjustified absences and failure to initiate Federation projects, the SK Federation passed a resolution removing Carlos and installing Vice President Chiqui Marie N. Carreon as president on September 29, 2018. The Sangguniang Panlungsod approved this change via Resolution No. 1169 on October 1, 2018.

Carlos filed a petition for certiorari in the Regional Trial Court (RTC), challenging her removal and arguing a lack of due process, as the removal did not follow the Joint Memorandum Circular (JMC) No. 2017-01 protocols, which she claimed required complaints to be filed with the Office of the President (OP).

Simultaneously, an administrative complaint was filed against Carlos by two SK members for failing to submit necessary developmental plans, leading to her removal by the Sangguniang Panlungsod on January 21, 2019, citing a violation of Republic Act (R.A.) No. 10742. The RTC dismissed Carlos's certiorari petition for lack of jurisdiction, asserting her appeal should have been made to the OP but was untimely.

Carlos appealed to the Court of Appeals (CA) in two cases: CA-G.R. SP No. 160131 regarding her SK Federation presidency removal and CA-G.R. SP No. 162895 concerning her SK Chairperson removal. The CA voided her removal as SK Federation president, citing the lack of jurisdiction by the Sangguniang Panlungsod, but upheld her removal as SK Chairperson, asserting compliance with R.A. No. 10742.

****Issues:****

1. Can the Sangguniang Panlungsod of a highly-urbanized city remove an SK Federation president?
2. Can they remove an SK Chairperson from office without judicial intervention?
3. Does the removal from office of an SK Chairperson also remove the officer as SK Federation president?

****Court's Decision:****

1. **Removal of SK Federation President:** The Supreme Court determined that the Sangguniang Panlungsod lacked jurisdiction to remove an SK Federation president, establishing that JMC No. 2017-01 grants sole jurisdiction to the Office of the President for such matters. Thus, Carlos's removal as SK Federation president was void, as affirmed by the CA in CA-G.R. SP No. 160131.

2. **Removal of SK Chairperson:** The Court confirmed that R.A. No. 10742 allows the Sangguniang Panlungsod to remove an SK Chairperson without judicial intervention. Carlos's failure to deliver critical plans facilitated her removal under this law, consistent with the CA's ruling in CA-G.R. SP No. 162895. It differentiated between the powers to remove the SK Chairperson under the SK Reform Act and the jurisdiction over the SK Federation.

3. **Effect on Federation Presidency:** The removal from SK Chairperson automatically resulted in her removal as SK Federation president since holding an SK Chairperson position is a precondition for the latter. This sequence rendered Carlos's appeal on her SK Federation presidency moot after her effective removal as the SK Chairperson.

Doctrine:

1. **Jurisdiction on Removal:** Jurisdiction on the removal of SK Federation Presidents lies solely with the Office of the President as per JMC 2017-01.

2. **SK Chairperson Removal:** R.A. No. 10742 empowers Sangguniang Panlungsod to remove an SK Chairperson for specified grounds without requiring judicial action.

Class Notes:

- **Jurisdiction and Procedural Compliance:** SK officials' removal processes differ between Federation positions, governed by JMC protocols and local chairperson roles covered under R.A. No. 10742.

- **Administrative Law:** Disciplinary action rooted in statutes is essential, and jurisdictional authority compliance impacts removal's legality.

Historical Background:

This case depicted evolving legislative practices post-2015 SK Reform Act (R.A. No. 10742) where youth governance structures experienced adjustments in administrative protocols addressing ineffectiveness, participation, and leadership transparency. The case

emphasized the balance between local legislative actions versus overarching frameworks provided by national legislation and administrative guidelines.