

Title: In the Matter of Disbarment of Atty. Antonio N. De Los Reyes for Gross Immoral Conduct and Violation of the Code of Professional Responsibility

Facts:

In February 1997, AAA was hired as a secretary at the Legal and Administrative Group of NHMFC under Atty. Antonio N. De Los Reyes. Subsequently, she was rapidly promoted to a permanent position. De Los Reyes began to display possessive and demanding behavior toward AAA, monitoring her communications and imposing his presence on her both during and after work hours.

The situation worsened when, in the last quarter of 1998, De Los Reyes physically abused AAA for refusing his advances, culminating in an incident on December 11, 1998, where he forcibly abducted and assaulted her when she declined a ride home. AAA reported the incident but chose not to file a formal complaint, feeling that it would be futile. She then attempted to resign but was convinced to stay and promised a reassignment.

Despite her efforts to distance herself from De Los Reyes, she ended up subjected to his coercive control and was inappropriately required to attend his personal desires, reading his love notes and enduring his volatile conduct. Over time, under the threat of job loss, she felt compelled to acquiesce to his sexual advances, essentially becoming his “sex slave.” She became deeply despondent, contemplating suicide and suffering from various illnesses.

AAA sought to escape De Los Reyes’ control by depicting a relationship with an American man, which escalated De Los Reyes’ possessiveness and abusive behavior. In 2003, when her efforts to distance herself from De Los Reyes seemed successful, he redirected his hostility toward her friends and colleagues. AAA filed a Complaint-Affidavit dated November 19, 2004, against De Los Reyes for continued harassment and wrongful disciplinary actions against her and her colleagues.

Issues:

1. Whether Atty. De Los Reyes committed sexual harassment and gross immoral conduct in violation of the Code of Professional Responsibility.
2. Whether the acts committed by Atty. De Los Reyes warrant his disbarment.

Court’s Decision:

The Supreme Court affirmed the findings and conclusions of the Integrated Bar of the Philippines (IBP) that respondent Atty. De Los Reyes indeed committed acts amounting to sexual harassment and gross immorality. The Court noted his “sextortion” and exploitation

of AAA, amounting to gross misbehavior that affected both his standing as a member of the Bar and the integrity of the legal profession. Therefore, the Court ruled in favor of disbarment, finding that the recommended penalty of indefinite suspension from the practice of law was not sufficient for the gravity of his actions.

Doctrine:

The Code of Professional Responsibility mandates that lawyers shall not engage in unlawful, dishonest, immoral or deceitful conduct, and must uphold the integrity and dignity of the legal profession at all times (Canon 1, Rule 1.01 and Canon 7, Rule 7.03). Good moral character is both a condition precedent and a continuing requirement for the practice of law, and any deficient behavior, whether public or private, can lead to disciplinary action.

Historical Background:

Disbarment cases in the Philippines are governed by the rules and jurisprudence surrounding the legal profession's ethical standards. This case highlights the imperative need for lawyers to maintain high moral standards as guardians of the law and officers of the court. The Supreme Court's decision in this case reiterates its commitment to cleanse the ranks of the legal profession of members who, through their misconduct, prove unworthy of the responsibilities and privileges of a lawyer.