

Title: Judge Ray Alan T. Drilon and Atty. Corazon P. Romero vs. Atty. Ariel D. Maglalang
(Disbarment for Falsification of Court Document)

Facts:

Judge Ray Alan T. Drilon and Atty. Corazon P. Romero of the Regional Trial Court, Branch 41, Bacolod City, discovered a forged document purporting to be an Order from their court declaring the presumptive death of Ruby S. Madrinian. Jodee Andren, represented as the petitioner in the document, claimed that it was provided to her by her lawyer, Atty. Ariel D. Maglalang, who she alleged to have hired for her annulment case. Atty. Romero, after finding the “Order,” verified that no such case existed in their dockets. Further investigation from the Clerk of Court and the NBI supported the non-existence of the case and implicated Atty. Maglalang as having fabricated the document and misleading the client. Atty. Maglalang denied the allegations and claimed no knowledge of Andren or Kho-Artizano, the individual who corroborated Andren’s claims. The IBP conducted its investigation and recommended disbarment, given the seriousness of the fabrication.

Issues:

The primary issue resolved by the Supreme Court was whether Atty. Ariel D. Maglalang was responsible for the fabrication of the court order and, thus, whether he should be sanctioned for such conduct. In doing so, the Court considered whether his actions warranted disbarment, as per the recommendations of the IBP.

Court’s Decision:

The Court concurred with the findings of the IBP-CBD and the recommendation of the IBP-BOG, ultimately deciding that Atty. Maglalang did fabricate the court document and subsequently disbarred him for his misconduct. The Court adopted the IBP’s factual determination that Atty. Maglalang committed deceit by providing his client with a counterfeit order, a serious breach of professional and ethical conduct, thus bringing disrepute to the legal profession. Atty. Maglalang’s defense, which amounted to a mere denial, was insufficient to overcome the evidence against him, including testimonies, expert verification, and documentary evidence.

Doctrine:

The Supreme Court reiterated the principle that falsification of judicial documents by a lawyer constitutes a serious breach of professional ethics and warrants the ultimate penalty of disbarment. The duty of fidelity to the law, the courts, and clients is paramount and violations thereof seriously undermine the administration of justice and the public’s trust in

the legal profession.

Historical Background:

As an institution, the Supreme Court of the Philippines has the constitutional authority to oversee members of the Philippine Bar and to discipline lawyers for unethical practices that tarnish the integrity of the legal profession. This disciplinary action serves to protect the public and uphold trust in the judicial system. Here, the case set a firm example that the Court does not tolerate any actions from lawyers that compromise the sanctity of court proceedings and documents, an important aspect of the nation's commitment to the rule of law.