

Title: Teodora Altobano-Ruiz v. Attys. Wilfredo A. Ruiz, Cherry Anne Dela Cruz, and Francisco S. Benedicto III

Facts:

Teodora Altobano-Ruiz filed a complaint for disbarment against her husband Atty. Wilfredo A. Ruiz and two other lawyers, Atty. Cherry Anne Dela Cruz and Atty. Francisco S. Benedicto III, for various violations of the Code of Professional Responsibility. She accused them of synchronized acts of harassment directed against her.

Teodora alleged physical violence, emotional stress, and economic abuse by Atty. Ruiz and successfully obtained a Permanent Protection Order from the Regional Trial Court, Pasig City, which Atty. Ruiz violated by refusing to provide support for their children. Subsequently, an entry of judgment was issued, leading to a writ of execution which Atty. Ruiz continued to defy.

Atty. Ruiz allegedly attempted to avoid providing support by entering into a Memorandum of Agreement with Radelia C. Sy, indicating that they were engaged and planning to marry and would place their properties in the name of Sy's son to evade the writ of execution.

Atty. Dela Cruz was previously Teodora's counsel and was accused of conspiracy by refusing to enforce the PPO. Atty. Benedicto, Atty. Ruiz's colleague and partner at the law firm, was involved in the nullity case against Teodora. Moreover, Atty. Ruiz attempted to hide his assets and locations from execution by providing false addresses.

The IBP-CBD recommended the disbarment of Atty. Wilfredo A. Ruiz and the dismissal of the complaint against Atty. Dela Cruz and Atty. Benedicto III for lack of merit. However, the IBP-BOG initially affirmed disbarment but later modified the recommendation, reducing the penalty to one-year suspension after considering evidence of Atty. Ruiz's compliance with providing support, prompting his motion for reconsideration.

Issues:

1. Did Atty. Wilfredo A. Ruiz commit violations of the Code of Professional Responsibility by failing to fulfill the Permanent Protection Order, engaging in deceitful acts to evade legal obligations, and entering into an illegal and immoral agreement with another woman?
2. Did Atty. Cherry Anne Dela Cruz and Atty. Francisco S. Benedicto III conspire with Atty. Ruiz to perpetrate acts of harassment against the complainant and thus also violate the Code of Professional Responsibility?

Court's Decision:

The Supreme Court ruled that Atty. Wilfredo A. Ruiz violated Rules 1.01, 1.02, 7.03, 10.01, 10.03, and 12.04 of the Code of Professional Responsibility for his refusal to comply with the PPO, deception in hiding assets and addresses, and immoral conduct. Consequently, the Court disbarred Atty. Ruiz and ordered his name stricken off the Roll of Attorneys. The complaints against Atty. Dela Cruz and Atty. Benedicto III were dismissed for lack of merit.

Doctrine:

Membership in the Philippine Bar is a privilege burdened with conditions. A lawyer must maintain good moral character and judicial fortitude, compliant with the Code of Professional Responsibility and the Lawyer's Oath. Violations may lead to administrative sanctions, including disbarment.

Class Notes:

Key elements from the decision are as follows:

- The obligation to provide support to children is considered to be part of a lawyer's duties toward their family and the community, and failure to do so may warrant disciplinary action.
- Deceptive behavior designed to circumvent the enforcement of court orders can demonstrate a disregard for the rule of law and the judicial process.
- Immoral conduct, such as maintaining an illicit relationship, is incompatible with the ethical standards expected of members of the Bar.
- Misrepresentation, misuse of legal processes, or deliberately providing false information to the courts can result in malpractice and are grounds for disbarment.

Historical Background:

This case illustrates the judiciary's commitment to maintaining the integrity of the Bar and its role in ensuring that lawyers adhere to their ethical obligations, which extends to private conduct materially related to their fitness to practice law. The decision reflects the continued development of enforcement mechanisms aimed at addressing misconduct among members of the legal profession.