

A.M. No. RTJ-12-2325 (Formerly A.M. No. 12-7-132-RTC). April 14,
2015 (Case Brief / Digest)
****Title: Office of the Court Administrator vs. Judge Alan L. Flores****

****Facts:****

This involves two consolidated administrative cases, A.M. No. RTJ-12-2325 and A.M. OCA IPI No. 11-3649-RTJ, against Judge Alan L. Flores of the Regional Trial Court (RTC) of Tubod, Lanao del Norte, Branch 7, and former Acting Presiding Judge of the RTC of Kapatagan, Lanao del Norte, Branch 21. The cases originated from investigations conducted by the Office of the Court Administrator (OCA) following two anonymous letters alleging various irregularities committed by Judge Flores. Among the allegations were that Judge Flores rendered favorable judgments for monetary consideration, decided annulment cases beyond his territorial jurisdiction, and provided undue favors to OCA audit teams visiting Lanao del Norte.

The OCA's investigation report uncovered multiple instances of non-compliance with the Rule on Declaration of Absolute Nullity of Void Marriages and Annulment of Voidable Marriages, particularly regarding the proper venue requirements and procedural delays in deciding criminal cases.

****Issues:****

1. Whether Judge Flores violated A.M. No. 02-11-10-SC by taking cognizance of and deciding annulment cases beyond his territorial jurisdiction.
2. Whether Judge Flores demonstrated gross misconduct through actions contrary to judicial decorum and procedure.
3. Whether Judge Flores incurred undue delays in rendering decisions or orders in several criminal cases.

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

The Supreme Court found Judge Flores guilty of Gross Ignorance of the Law and Gross Misconduct, leading to his dismissal from service with forfeiture of all retirement benefits except accrued leave credits, disqualification from reinstatement or appointment to any public office. The Court also found him guilty of Undue Delay in Rendering Decisions/Orders and imposed a fine of P20,000.00.

****Doctrine:****

The decision reiterated the doctrine that competence and diligence are prerequisites to the due performance of judicial office, and that failure to adhere to procedural rules due to ignorance or misconduct is punishable by dismissal from service. It also affirmed the

A.M. No. RTJ-12-2325 (Formerly A.M. No. 12-7-132-RTC). April 14, 2015 (Case Brief / Digest)
principle that undue delay in rendering decisions or orders constitutes gross inefficiency warranting administrative sanctions.

****Class Notes:****

- Gross Ignorance of the Law: An error that is gross or patent, deliberate or malicious, indicating a judge's failure to apply settled law and jurisprudence.
- Gross Misconduct: Intentional wrongdoing or deliberate violation of rules of law or standards of behavior connected to official functions, implying wrongful intent.
- Undue Delay in Rendering Orders: The failure to resolve cases or motions within the reglementary period prescribed by law or court rules, without valid reasons.
- A.M. No. 02-11-10-SC: The Rule on Declaration of Absolute Nullity of Void Marriages and Annulment of Voidable Marriages, specifying procedural requirements including proper venue.

****Historical Background:****

The case highlights the challenges in the Philippine judiciary regarding adherence to procedural rules and ethical standards among judges. It illustrates the Supreme Court's commitment to maintaining integrity and competence in the judiciary by imposing strict penalties on those who violate judicial norms and legal procedures.