

****Title:** Paz M. Garcia vs. Hon. Catalino Macaraig, Jr.**

****Facts:**** Paz M. Garcia filed an administrative complaint against Hon. Catalino Macaraig, Jr., in his capacity as a former Judge of the Court of First Instance of Laguna, Branch VI, and at the time of the complaint, the Undersecretary of Justice. The complaint alleged dishonesty, oath of office violation, gross incompetence, and violations of the Judiciary Act of 1948, related to Macaraig's failure to submit reports, collect salaries without performing duties, and his dishonest claim of starting his official duties as a judge. Macaraig responded, detailing the difficulties of setting up the new court branch, including issues with securing courtroom space and furnishing, and stated that he didn't perform judicial functions due to uncontrollable circumstances. He justified the collection of salaries by his organizational efforts and assistance to the Department of Justice.

****Procedural Posture:**** Upon receiving the complaint and the response from Macaraig, the Supreme Court felt the case could be resolved based on the submissions, as the central facts were essentially undisputed. The Court embarked on an in-depth examination to deliberate on the matter.

****Issues:****

1. Whether Macaraig's collection of salaries without performing judicial duties constituted dishonesty.
2. Whether Macaraig violated Sections 5, 55, and 58 of the Judiciary Act of 1948 and related circulars by not submitting required reports and certificates.
3. The applicability of the Judiciary Act and circulars to a judge unable to perform judicial duties due to circumstances beyond their control.

****Court's Decision:**** The Supreme Court dismissed the complaint against Macaraig. The Court found no dishonesty in Macaraig's actions, recognizing that uncontrollable circumstances prevented him from performing his judicial duties, and thus, he was still entitled to his salary. It was also determined that the Judiciary Act and Department of Justice circulars requiring reports and certificates of service did not apply to a judge who has not yet commenced judicial functions. The Court highlighted the importance of maintaining the judiciary's independence and discouraged the practice of judges taking on non-judicial functions within the Department of Justice.

****Doctrine:**** This case reiterates the doctrine of judicial independence and clarifies that the statutory obligations related to the submission of reports and certification of services are

inapplicable to judges precluded from performing judicial duties by circumstances beyond their control.

****Class Notes:****

- Judicial Independence: Essential for the separation of powers, ensuring no branch of government overreaches its authority.
- Applicability of Laws: Statutory provisions and circulars demanding reports and certifications from judges do not apply in situations where judges are unable to perform judicial duties due to external constraints.
- Importance of Context: Understanding the reasons behind a judge's inability to perform duties is crucial before making allegations of misconduct.

****Historical Background:**** This case underscores the challenges faced in the Philippine judicial system, particularly in instances where the infrastructure and administrative support are insufficient for newly appointed judges to commence their duties. It also highlights the judiciary's adaptability in confronting such hurdles while maintaining its core principle of independence from the executive branch, a cornerstone for a functioning democracy under the rule of law.