

**\*\*Title:\*\***

Alexander Padilla vs. Hon. Baltazar R. Dizon

**\*\*Facts:\*\***

Alexander Padilla, then Commissioner of Customs, filed an administrative complaint on August 6, 1987, against Judge Baltazar R. Dizon of the Regional Trial Court (RTC) of Pasay City, Branch 113. The complaint accused Judge Dizon of rendering an erroneously acquitted decision in Criminal Case No. 86-10126-P, titled “People of the Philippines vs. Lo Chi Fai,” alleging gross incompetence and ignorance of the law. The case involved Lo Chi Fai, a tourist caught trying to smuggle substantial amounts of foreign currencies out of the Philippines without the required Central Bank authorization. Despite being filed several months after the decision, the complaint by Padilla claimed the decision showed a manifest error in judgment on part of Judge Dizon.

In his defense, Judge Dizon recounted his long-standing career and asserted his decision was based on justice and fundamental principles. The core issue presented to the Supreme Court was whether Dizon’s decision exhibited gross incompetence or ignorance of the law. The judicial process leading to the Supreme Court involved an administrative complaint mechanism meant to uphold judicial integrity and accountability.

**\*\*Issues:\*\***

1. Whether Judge Dizon was guilty of gross incompetence or ignorance of the law in acquitting Lo Chi Fai.
2. The applicability of intent or malice in violations of Central Bank Circular No. 960 by special laws, which are considered mala prohibita.
3. The relevance of the respondent’s methodology in assessing the evidence presented against Lo Chi Fai and his interpretation of CB Circular No. 960.

**\*\*Court’s Decision:\*\***

The Supreme Court found Judge Baltazar R. Dizon guilty of gross incompetence, gross ignorance of the law, and grave misconduct. The Court clarified that offenses punished by special laws, such as the Central Bank Circular No. 960 invoked in the Lo Chi Fai case, are considered mala prohibita—where mere commission of the prohibited act constitutes the offense, without necessity of proving criminal intent or malice. The Court underscored that Judge Dizon’s erroneous requirement of proving intent for a mala prohibita offense demonstrated a failure to uphold the law and subsequently led to an unwarranted acquittal. Dizon’s actions, including his directive to release a portion of the seized funds to the

accused, further exhibited his misunderstanding of the legal principles at play. Consequently, the Supreme Court ordered Judge Dizon's dismissal from service, forfeiture of all retirement benefits and privileges, and a prohibition against reinstatement in any branch of government service.

**\*\*Doctrine:\*\***

The Supreme Court reiterated the doctrine that offenses defined by special laws are mala prohibita, where the mere act of committing what is prohibited by law is enough to constitute the offense, and the prosecution need not establish malice or criminal intent.

**\*\*Class Notes:\*\***

1. **\*\*Mala Prohibita vs. Mala In Se\*\***: Essential to understand the distinction where mala prohibita refers to conduct that is criminal only because it is prohibited by law, as opposed to mala in se, which are acts wrong in themselves, and involves the requisite of intent or malice for prosecution.
2. **\*\*Role and Accountability of Judges\*\***: This case exemplifies the judicial accountability framework within which judges operate, highlighting that decisions made in "gross ignorance of the law" can lead to significant consequences, including removal from office.
3. **\*\*Administrative Proceedings in Judicial Misconduct\*\***: Provides a procedural roadmap for handling complaints against judges, emphasizing the Supreme Court's oversight function in maintaining the integrity and competence of the judiciary.
4. **\*\*CB Circular No. 960\*\***: Understanding the legal requirements around the movement of foreign currency in and out of the Philippines and the implications for individuals who violate these regulations.

**\*\*Historical Background\*\***

This case unfolded in the context of post-1986 EDSA Revolution Philippines, a period marked by significant political and legal changes aimed at restoring democracy and reforming institutions, including the judiciary. The judicial system was under close scrutiny to eliminate corruption and incompetence, as part of broader efforts to rebuild trust in governmental institutions. Judge Dizon's appointment and subsequent actions, as well as the administrative proceedings against him, must be understood against this backdrop of reform and the heightened expectations for judicial conduct and accountability that accompanied the transition period.