

****Title**:** Mañozca vs. Domagas

****Facts**:**

The case originates from a complaint filed by Belinda Luistro Mañozca against her husband, Elmer de Jesus Mañozca, for bigamy in Criminal Case No. V-8201, assigned to Judge Roger A. Domagas at Branch 46, RTC of Urdaneta, Pangasinan. After the prosecution concluded its presentation, the defense filed a Demurrer to Evidence, which Judge Domagas granted, citing the precedent case of U.S. v. Enriquez to argue for the lack of fraudulent intent to commit bigamy based on a notarized document titled “Separation of Property with Renunciation of Rights”, presumably agreed upon by both spouses. Belinda Luistro Mañozca then filed a sworn letter-complaint against Judge Domagas, alleging gross ignorance of the law and a manifestly unjust judgment, claiming significant factual differences between her case and U.S. v. Enriquez, notably that her husband sought to annul their marriage and remarried in close succession. Judge Domagas, before his death, defended his decision by emphasizing the notarized agreement between the spouses as evidence of no criminal intent.

****Procedural Posture**:**

Upon receiving the complaint, the Supreme Court took into account the explanations of both parties. However, Judge Domagas died while the case was under evaluation by the Office of the Court Administrator. Following the precedent in *Hermosa v. Paraiso*, the Supreme Court decided to resolve the case despite the respondent’s death.

****Issues**:**

1. Whether Judge Domagas exhibited gross ignorance of the law in granting the Demurrer to Evidence based on the factual and legal grounds he cited.
2. Whether the notarized document titled “Separation of Property with Renunciation of Rights” can negate fraudulent intent in a charge for bigamy.

****Court’s Decision**:**

The Supreme Court found Judge Domagas guilty of gross ignorance of the law. It highlighted that the agreement executed by the parties was contrary to law and could not justify a finding of good faith or negate fraudulent intent on part of the accused husband, especially considering the timeline of events leading to the second marriage. The Supreme Court ordered the forfeiture of P5,000.00 from Judge Domagas’s retirement benefits as a penalty for his gross ignorance of the law.

****Doctrine**:**

1. ****Gross Ignorance of the Law**:** A judge demonstrates gross ignorance of the law when they fail to properly apply legal principles to the facts before them, leading to a manifestly unjust decision or order.
2. ****Good Faith in Bigamy Charges**:** The existence of a notarized agreement purporting to dissolve marital obligations cannot be used to justify or establish good faith in charges of bigamy, as such agreements are contrary to law.

****Class Notes**:**

- ****Gross Ignorance of the Law**:** When a judge's decision deviates significantly from established legal principles, causing unjust outcomes.
- ****Bigamy**:** Defined under the Revised Penal Code of the Philippines, one commits bigamy by marrying again before the first marriage is legally dissolved. Good faith or belief in the dissolution of the first marriage does not absolve the individual if such belief is unfounded in law.
- ****Demurrer to Evidence**:** A motion filed by the defense after the prosecution rests its case, claiming that the evidence presented is insufficient for conviction. Should it be granted, it results in an acquittal without the defense presenting its evidence.
- ****Relevant Statutes/Cases**:**
- ****U.S. v. Enriquez**:** Their decision relied upon for analogy, differentiating the cases based on the accused's good faith belief in the dissolution of the first marriage.
- ****Hermosa v. Paraiso**:** Establishes the principle that administrative cases against judges can proceed or be resolved even posthumously.

****Historical Background**:**

This case emphasizes the accountability of judges in interpreting and applying the law correctly. It showcases the judiciary's self-regulatory mechanisms and highlights the importance of precedent and factual bases in judicial decisions, particularly in interpreting acts that might constitute criminal behavior such as bigamy. The case reiterates established principles against judicial misapplication of the law and the repercussions of such actions on a judge's career and legacy.