

Title: Fernando T. Collantes vs. Atty. Vicente C. Renomeron (Disbarment Case)

Facts:

The case pertains to a disbarment complaint filed by Attorney Fernando T. Collantes against Attorney Vicente C. Renomeron, who was the Register of Deeds of Tacloban City, for his actions in the application for registration of 163 Deeds of Absolute Sale with Assignment by V & G Better Homes Subdivision, Inc. (V&G) to the GSIS. The complaint was initiated due to Renomeron's refusal to process the registrations despite repeated requests, allegedly seeking pecuniary benefits and imposing additional requirements arbitrarily. This behavior prompted Collantes first to approach the National Land Titles and Deeds Registration Administration (NLTDRRA) with administrative charges against Renomeron, which led to an investigation and subsequently to Renomeron's dismissal from the government service upon recommendation by the Secretary of Justice and order of the President of the Philippines. Parallely, Collantes filed a disbarment complaint against Renomeron in the Supreme Court, seeking disciplinary action against Renomeron in his capacity as a lawyer.

Issues:

1. Whether Attorney Renomeron's conduct as a public official also violated his oath as a lawyer, warranting disciplinary actions by the Supreme Court.

Court's Decision:

The Supreme Court unanimously decided that Atty. Vicente C. Renomeron's misconduct, as detailed in the complaints and subsequent investigations, not only breached his duties as a public official but also violated his oath as a lawyer, as well as provisions in the Code of Professional Responsibility which apply to lawyers in government service. The Court emphasized that a lawyer's duty extends to the ethical discharge of responsibilities in official conduct and that Renomeron's actions were antithetical to the standards expected from members of the Bar. The Court ordered the disbarment of Renomeron, highlighting the expectation of the utmost integrity and ethical behavior from legal professionals, both in their professional practice and public service.

Doctrine:

This case reiterates the doctrine that the ethical standards governing the conduct of lawyers apply with equal force to those in government service. The Supreme Court underscores that violations of these ethical standards, including acts of dishonesty, misconduct, or abuse of power, are grounds for disciplinary action, including disbarment.

Class Notes:

- **Lawyers in Public Service:** Lawyers who serve in public offices are subject to the same ethical standards as those in private practice, as elucidated in the Code of Professional Responsibility.
- **Disciplinary Actions:** Misconduct in any capacity, whether as a public official or as a practicing lawyer, can lead to disbarment.
- **Ethical Obligations:** The obligation to act ethically extends beyond the courtroom and legal practice, covering all facets of professional conduct.
- **Procedural Process:** The court demonstrates a procedural path for handling complaints against lawyers, showcasing the integration of administrative and judicial processes.

Historical Background:

This case sheds light on the expectation of ethical conduct among lawyers, particularly those in public service, within the Philippine legal system. It reflects the judiciary's stance on maintaining the integrity of the legal profession by ensuring that lawyers adhere to the highest ethical standards, regardless of their professional or public roles. The detailed procedure leading to Renomeron's disbarment serves as a precedent and a stern warning against misconduct, underlining the comprehensive jurisdiction of the Supreme Court over its constituents in both their professional practice and official conduct in public office.