Title: Re: Anonymous Complaint Against Judge Laarni N. Dajao, Presiding Judge, Regional Trial Court, Branch 27, Siocon, Zamboanga del Norte

Facts:

On January 15, 2014, an anonymous letter-complaint was filed against Judge Laarni N. Dajao, highlighting three key grievances:

- 1. Judge Dajao's pattern of unprofessional conduct in language and deed.
- 2. His self-identification as "Dr. Laarni N. Dajao, Ph.D (CL-HC)" in official documents.
- 3. The use of malicious and degrading language in his Order dated November 27, 2013, in Criminal Case Nos. 2013-08-05 (1049), 2013-08-06 (1050), and 2013-08-07 (1051).

In his comment dated May 6, 2014, Judge Dajao argued that the complaint was an attempt to malign him, indicating that the criminal cases mentioned in his November 27, 2013, Order were dismissed without prejudice. He claimed that he could not respond to the complaint substantively.

Procedural Posture:

The Office of the Court Administrator (OCA) found Judge Dajao administratively liable for vulgar and unbecoming conduct, recommending the complaint be re-docketed as a regular matter and that Judge Dajao be fined Php 5,000 with a stern warning against future infractions.

Issues:

- 1. Whether Judge Dajao's use of unprofessional and vulgar language constituted misconduct.
- 2. Whether the act of including "Dr." and "Ph.D" in his orders was inappropriate and indicative of egotism.

Court's Decision:

The Court agreed with the findings of the OCA, emphasizing that the use of terms such as "idiot", "psychopath", "big dick (penis)", "sadistic", and "homophobic baklita" was inappropriate for a judge and diminished the dignity of the judiciary. The addition of "Dr." and "Ph.D." to his name in official documents was viewed as unnecessary self-promotion, contrary to the humility expected of judicial officers.

Judge Dajao was found guilty of vulgar and unbecoming conduct and was fined Php 5,000. He was sternly warned that repeating the same or similar actions would result in more severe penalties.

Doctrine:

- 1. Judges are required to maintain high standards of propriety and avoid even the appearance of impropriety in all activities (Sections 1 and 2, Canon 4, New Code of Judicial Conduct).
- 2. Judges should not seek publicity for personal vainglory and must conduct themselves with humility (Canon 2, Rule 2.02, Code of Judicial Conduct).

Class Notes:

- 1. **Propriety in Judicial Conduct:** Judges must avoid language and actions that could be interpreted as disrespectful or vulgar. This case reiterates the importance of composure and grace in judicial language and actions.
- 2. **Vainglory and Self-Promotion:** Judges should refrain from using their titles in ways that could be seen as self-serving or promotional. Acts of self-promotion can undermine the dignity of the judicial office.

Statutory Provisions:

- New Code of Judicial Conduct, Sections 1 and 2, Canon 4.
- Code of Judicial Conduct, Canon 2, Rule 2.02.

Historical Background:

The case reflects ongoing efforts by the Philippine judiciary to uphold the integrity and dignity of the judicial office. Since judges are considered the epitome of justice, any conduct that detracts from this image is taken seriously to maintain public confidence in the judicial system.