

****Title:**** Ben D. Marces, Sr. vs. Judge Paul T. Arcangel, A.M. No. RTJ-91-764

****Facts:****

In 1984, Ben D. Marces, Sr. and the Cañas family, who lived nearby in the BRC Village, Catalunan Pequeño, Davao City, became embroiled in a series of neighborhood disputes. These began with a complaint from a domestic helper of the Cañas family to Marces, the purok leader at the time, alleging maltreatment. Though initially resolved by barangay authorities, tensions escalated, culminating in personal altercations.

On September 27, 1990, Mrs. Ruth Marces and her daughter Lydia exchanged insults with Mrs. Flordeliza Cañas. The next day, Mrs. Cañas orchestrated the arrest of Ben Marces using alias warrants, which implicated him in several criminal cases for violations of Batas Pambansa Blg. 22. These warrants were issued by Judge Edipolo Sarabia upon the request of respondent Judge Paul T. Arcangel.

Multiple conciliation attempts by barangay officials between the two families ensued, with Judge Arcangel attending uninvited and allegedly disrupting the sessions. Tensions between the families continued to escalate, resulting in a violent confrontation on December 29, 1990, and subsequent arrests of Marces and his family members in early January 1991, allegedly facilitated by the intervention of Judge Arcangel.

Marces filed a complaint against Judge Arcangel alleging serious misconduct, abuse of authority, harassment, and immorality, specifically accusing him of misusing his judicial influence to assist the Cañas family. The Office of the Court Administrator, the Court of Appeals (Fidel P. Purisima), and the examining RTC Judge Romeo D. Marasigan were subsequently involved in the investigation, leading to the present case in the Supreme Court.

****Issues:****

1. Did Judge Arcangel improperly influence the issuance of alias warrants against Ben Marces by requesting them from another judge?
2. Was Judge Arcangel's conduct at the barangay mediation conferences improper?
3. Did Judge Arcangel improperly influence the arrests of the Marces family on January 2, 1991?
4. Were the actions of harassment purported by Marces substantiated?
5. Are the allegations of illicit relations between Judge Arcangel and Mrs. Cañas supported by evidence?

****Court's Decision:****

1. ****Influence on Alias Warrants:****

- The Supreme Court found substantial evidence proving that Judge Arcangel improperly influenced Judge Sarabia to issue alias warrants against Marces. This was evidenced by a handwritten note from Arcangel requesting the warrants.
- DOCTRINAL BASIS: Canon 2, Rule 2.04 of the Code of Judicial Conduct prohibits judges from influencing outcomes in disputes not within their jurisdiction.

2. ****Conduct at Mediation Conferences:****

- The Court found that Judge Arcangel's attendance and actions at the barangay mediation conferences were inappropriate, as he intruded without being part of the case officially and used his judicial position to exert influence.
- DOCTRINAL BASIS: Canon 2, Rule 2.03 underscores maintaining propriety and avoiding the impression of influence.

3. ****Arrests of the Marces Family:****

- Judge Arcangel inappropriately facilitated the arrests of the Marces family by introducing Wilfredo Cañas to Col. Nelson Estares, leading to arrests under dubious circumstances.
- DOCTRINAL BASIS: Canon 30 of the Canons of Judicial Ethics, stressing on avoiding actions that compromise judicial impartiality.

4. ****Harassment:****

- The Court found insufficient evidence to support many claims of harassment detailed by Marces, such as contacting PAL management and an administrative case against Nikki Marces.
- The allegations lacked corroborative evidence and were seen more as unsubstantiated personal grievances.

5. ****Illicit Relations:****

- The allegations of an illicit relationship were dismissed due to lack of substantial evidence. Witness testimonies, including those of Wilfredo Cañas, indicated Judge Arcangel's presence related to business interests and not to personal misconduct.
- DOCTRINAL BASIS: Article 215, New Civil Code emphasizes the protection of familial reputation absent substantial proof of misconduct.

****Doctrine:****

- Judges must refrain from using their office to influence matters outside their courtrooms.

- They should avoid actions that could be perceived as partiality or misconduct.
- Proper judicial conduct requires maintaining propriety, impartiality, and avoiding any appearance of impropriety.

****Class Notes:****

- ****Judicial Impartiality:**** Judges must not involve themselves in cases outside their jurisdiction. Canon 2 of the Code of Judicial Conduct prohibits influencing pending litigation.
- ****Propriety and Influence:**** Both Canon 12 and Canon 30 of the Canons of Judicial Ethics set expectations for judicial behavior beyond official functions.
- ****Conflict of Interest:**** Judges need to avoid appearing partial or taking part in disputes where they might have personal stakes.
- ****Illicit Relations:**** Accusations require substantial evidentiary support (New Civil Code, Art 215 and Family Code, Art 149).

****Historical Background:****

This case arose in the broader context of ethical expectations for judges in the Philippines. It underscores the judiciary's responsibility to maintain public confidence through impartiality and propriety in all activities. The early '90s saw increased scrutiny on judicial conduct, and this case reinforced the necessity for clear boundaries between judicial duties and personal relations.