

### **Title:** Asuncion S. Ligid vs. Judge Policarpio S. Camano, Jr., A.M. No. RTJ-99-1509, November 24, 1999

---

### **Facts:**

1. **Introduction:** The case involves Asuncion S. Ligid (complainant) against Judge Policarpio S. Camano, Jr. (respondent) from the Regional Trial Court, Branch 58, Tigaon, Camarines Sur.
  2. **Relationship History:** In 1975, Ligid met and entered into a romantic relationship with Camano, then a First Lieutenant at the Judge Advocate General's Office in Sangley Naval Base, Cavite. They cohabited for years and bore a child, Joanne L. Camano.
  3. **Business Support:** Ligid supported Camano financially, including redeeming his mortgaged house, buying a passenger jeep, and subsidizing his children's education.
  4. **Relationship Strain & Separation:** They eventually separated, and Ligid went to the United States, marrying an American, Frank Pecot. Camano distanced himself, citing moral obligations of his judicial position after his 1983 appointment as a municipal judge.
  5. **Custody Transition:** Ligid later returned to the Philippines, taking Joanne with her. Despite Camano's separation from Ligid, he maintained financial support for Joanne.
  6. **Complaint Filed:** On November 7, 1997, Ligid lodged an administrative complaint against Camano for abandonment, dishonesty, oppression, deceit, immorality, and misconduct.
  7. **Respondent's Defense:** Camano denied the charges, maintained he always supported Joanne, and refuted allegations of abuse and immoral conduct.
  8. **Procedural History:** During the proceedings, Camano applied for optional retirement, which was approved in June 1997, including withholding certain retirement benefits pending case resolution.
  9. **Further Developments:** The administrative case continued despite his retirement as cessation does not nullify the Court's jurisdiction over pending disciplinary proceedings.
-

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

1. **\*\*Immorality and Misconduct:\*\*** Whether Camano's cohabitation with Ligid and fathering a child with her constituted gross immorality and misconduct.
2. **\*\*Administrative Violations:\*\*** Whether Camano engaged in oppression, deceit, and dishonesty in the context of his judicial responsibilities.
3. **\*\*Support Obligation:\*\*** Whether Camano should be held liable for failing to provide sufficient financial support for his daughter, Joanne.

—

### **\*\*Court's Decision:\*\***

1. **\*\*Immorality and Misconduct:\*\***
  - **\*\*Finding:\*\*** The Court held that evidence proved Camano's relationship and cohabitation with Ligid for over 20 years, thus finding him guilty of gross misconduct and immorality. Testimonies and documents corroborated these claims.
  - **\*\*Rationale:\*\*** Judges must maintain the highest standards of morality, both in public and private life, to uphold public confidence in the judiciary. Camano violated Canon 2, Rule 2.01 of the Code of Judicial Conduct.
2. **\*\*Administrative Violations:\*\***
  - **\*\*Finding:\*\*** The Court identified substantial evidence of administrative violations, including unauthorized absences and deceitful conduct.
  - **\*\*Rationale:\*\*** As a judge, Camano's behavior failed to promote public confidence and integrity in the judiciary. The documented acts and testimonial evidence outweighed his defenses and testimonials from associates.
3. **\*\*Support Obligation:\*\***
  - **\*\*Finding:\*\*** The Court found Camano responsible for providing financial support to Joanne, his daughter with Ligid.
  - **\*\*Rationale:\*\*** Given the established paternal relationship, the support obligation was a corollary to his recognized parental duties.

—

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

- **\*\*Judicial Integrity:\*\*** Judges must uphold private and public morality to maintain public

confidence in the judicial system.

- **Ex Post Jurisdiction:** A judge's retirement does not preclude the Court from resolving pending administrative cases and imposing appropriate sanctions.
- **Parental Support:** A legal obligation exists for parents to support their children irrespective of personal and professional circumstances.

—

### **Class Notes:**

1. **Judicial Code of Conduct:** Canon 2 - Avoiding impropriety and promoting confidence in judicial integrity; Rule 2.01 - Maintaining impartiality and integrity.
2. **Substantial Evidence:** In administrative cases, the standard of substantial evidence suffices to establish factual findings impacting a judge's fitness.
3. **Ex Parte Jurisdiction:** Even post-retirement, the Court retains authority over ongoing disciplinary cases ensuring accountability and compliance with judicial ethics.
4. **Parental Support Obligation:** Parents have an inherent duty to support their children financially, as articulated in Family Code provisions.

—

### **Historical Background:**

- **Judicial Ethics:** The case illustrates judicial reforms in the Philippines aimed at reinforcing the moral and ethical standards within the judiciary.
- **Context of Judicial Accountability:** The ruling underscores the evolution of the Supreme Court's stringent oversight in maintaining ethical conduct among its members, reflective of broader governance and administrative integrity reforms in the judiciary during the late 1990s.