

Facts:

Judge Elenita C. Dimaguila presided over Criminal Case No. 14-0504 for Grave Coercion against Ma. Victoria S.D. Carpio and John Persius S.D. Carpio. During the case proceedings, Judge Dimaguila opted not to refer the case to the mandatory Court-Annexed Mediation (CAM) and Judicial Dispute Resolution (JDR), as outlined in A.M. No. 11-1-6-SC-PHILJA. The complainants, in response, filed a Joint Complaint Affidavit on February 26, 2016, citing Gross Ignorance of the Law, Manifest Bias and Partiality, Patently Erroneous and Serious Irregularity of Judgment, and Grave Abuse of Authority/Discretion before the Office of the Court Administrator (OCA).

Dimaguila, in her May 18, 2016 Comment, acknowledged her awareness of the guidelines but defended her decision by stating that the complainants had declared in open court their lack of interest in settling the civil aspect of the case, thereby justifying the non-referral to CAM and JDR to avoid further delay.

On January 19, 2017, the OCA recommended re-docketing the case as a regular administrative matter against Dimaguila and imposed a P10,000 fine for Gross Ignorance of the Law. The Supreme Court adopted these findings, and on April 17, 2017, rendered the aforesaid fine to Dimaguila.

Judge Dimaguila filed a Motion for Reconsideration on April 20, 2018, asserting that her actions did not equate to gross ignorance but were intended to avoid justice delays given the complainants' stance. She steadfastly claimed familiarity and adherence to the CAM and JDR guidelines in other cases.

Issues:

1. Whether Dimaguila's failure to refer the case to CAM and JDR constitutes Gross Ignorance of the Law.
2. Whether the penalty imposed on Judge Dimaguila was appropriate based on her actions and intentions.

Court's Decision:

Upon evaluating the case, the Supreme Court found that Dimaguila's failure to refer the case to CAM and JDR did not rise to the level constituting Gross Ignorance of the Law, which necessitates bad faith, dishonesty, or similar motives in erroneous judicial acts. Dimaguila's actions were noted to stem from a logical albeit incorrect judgment aiming to

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expedite proceedings rather than from a malevolent intent.

The Court concluded that Dimaguila was, however, liable for the less serious charge of Violation of Supreme Court Rules, Directives, and Circulars due to her non-compliance with A.M. No. 11-1-6-SC-PHILJA despite her correct application of these rules in other instances. The imposed penalty was thus mitigated from a fine of P10,000 to a reprimand with a stern warning against recurrence.

#### Doctrine:

The doctrine emphasized that deviations from mandatory judicial procedures, even if well-intentioned, are subject to administrative liability unless bad faith or corrupt motives are proven. This decision establishes that proper procedural compliance is obligatory, irrespective of perceived futility, to preserve judicial integrity and consistency.

#### Class Notes:

1. Gross Ignorance of the Law - Requires proof of bad faith or malicious intent.  
- Rule 140, Section 8, Rules of Court.
2. Court-Annexed Mediation (CAM) and Judicial Dispute Resolution (JDR) - Mandatory referral for less grave felonies involving private offended parties.  
- A.M. No. 11-1-6-SC-PHILJA.
3. Administrative Liability - Misapplications without malicious intent lead to lesser charges, such as Violation of Supreme Court Rules.  
- Rule 140, Section 9, Rules of Court.

#### Historical Background:

This case illustrates the judiciary's unwavering commitment to procedural adherence within the Philippine legal framework. Established in 2011, A.M. No. 11-1-6-SC-PHILJA marked a significant step towards institutionalizing alternative dispute resolution within the judicial system. The case against Judge Dimaguila underscores the jurisprudential balance between procedural fidelity and judicial discretion, reflecting the development of judicial accountability standards as a response to augmenting public trust in the judiciary.