

Title: Julio & Lorica v. Judge Cacatian-Beltran – Administrative Complaint for Judicial  
Conduct 13, 2014 (Case Brief / Digest)

Facts:

Claire Ann Campos, a 17-year-old student with a cleft palate, filed an affidavit-complaint before the Tuguegarao City Prosecution Office against Sr. Remy Angela Junio and Dr. Josephine D. Lorica, alleging violations of Republic Act (R.A.) No. 7610 (Child Abuse Law) and R.A. No. 7277 (Magna Carta for the Disabled). She claimed SPUP refused her enrollment in the B.S. Nursing course for her sophomore year due to her disability, despite completing the freshman curriculum.

On August 22, 2008, the prosecutor's office found probable cause to indict Junio and Lorica. They appealed to the Department of Justice (DOJ), but the Undersecretary denied their petition on February 24, 2011. On March 31, 2011, informations were filed against them in the RTC of Tuguegarao City, Branch 4.

Following a procedural reassignment to Judge Marivic A. Cacatian-Beltran of RTC Branch 3, Junio and Lorica moved for reconsideration of the DOJ resolution on April 4, 2011. On May 5, 2011, arrest warrants were issued; however, DOJ Secretary Leila de Lima granted their motion and ordered the withdrawal of the informations on August 8, 2011, citing lack of probable cause.

Junio and Lorica filed for dismissal of the cases based on this new resolution, but Judge Cacatian-Beltran delayed ruling. In her January 6, 2012 order, she denied the joint motion to withdraw informations, citing judicial discretion even with DOJ's withdrawal directive, thus prompting Junio and Lorica to file an administrative complaint against the judge for delay and perceived usurpation of prosecutorial functions.

Issues:

1. Whether Judge Cacatian-Beltran committed undue delay in resolving the joint motion to withdraw informations.
2. Whether Judge Cacatian-Beltran exceeded her judicial role by denying the withdrawal of informations despite a DOJ directive.

Court's Decision:

1. **\*\*Delay in Resolving Motion:\*\*** The Supreme Court noted that Judge Cacatian-Beltran failed to resolve the joint motion within the 90-day period prescribed by the Philippine Constitution and the Code of Judicial Conduct. Although explanations were given for the

delay, it was still her responsibility to ensure a timely decision, necessitating admonishment. 13, 2014 (Case Brief / Digest)

2. **\*\*Denial of Motion to Withdraw Informations:\*\*** The Supreme Court upheld the trial court's discretion to independently assess the merits of a case despite a DOJ directive, emphasizing the judiciary's role in maintaining judicial independence from the executive branch. Judge Cacatian-Beltran's thorough review of all relevant documents before denying the motion did not equate to prosecutorial conduct but rather a judge exercising due diligence.

#### Doctrine:

- The judiciary maintains the discretion to uphold or reject prosecution recommendations even post-filing of criminal informations. This underscores judicial independence as delineated in the case *Crespo v. Mogul*.
- The period prescribed for judicial resolutions, including non-final orders, must be adhered to, as set forth in the Constitution and the Code of Judicial Conduct.

#### Class Notes:

- **\*\*Judicial Independence:\*\*** Courts are not bound by prosecutorial decisions post-case filing.
- **\*\*90-day Resolution Period:\*\*** Judicial officers must resolve cases and motions within a 90-day period, stipulated under the Constitution.
- **\*\*Separation of Powers:\*\*** Once a case is in court, any resolution rests within judicial discretion, not subject to executive determinations without judicial evaluation.

#### Historical Background:

This case reflects systemic checks and balances and the separation of powers between the judicial and executive branches in the Philippine legal sphere. It exemplifies how procedural due diligence is as crucial as substantive justice, particularly in safeguarding the judiciary's independence when faced with prosecutorial decisions. The administrative complaint against Judge Cacatian-Beltran, born out of a possible overreach or inefficiency claim, illustrates the ongoing judicial scrutiny even among judiciary members to uphold transparency and accountability within the legal system.