

**Title:** Junio and Lorica v. Judge Cacatian-Beltran

**Facts:**

- Initial Complaint:** Claire Ann Campos, a 17-year-old student, filed an affidavit-complaint for violations of the Child Abuse Law (Republic Act No. 7610) and the Magna Carta for the Disabled (Republic Act No. 7277) against Sr. Remy Angela Junio and Dr. Josephine D. Lorica, officials of St. Paul University of the Philippines (SPUP) for allegedly refusing her enrollment in the B.S. Nursing course due to her cleft palate.
- Prosecution Office Decision:** On August 22, 2008, the Tuguegarao City Prosecution Office found probable cause against Junio and Lorica and recommended filing the appropriate charges.
- Appeal to DOJ:** Junio and Lorica appealed the prosecutor's decision. Undersecretary Jose Vicente Salazar denied the appeal on February 24, 2011.
- Charges Filed:** On March 31, 2011, the prosecutor filed informations against them for violations related to R.A. Nos. 7610 and 7277 at the RTC Branch 4, later reassigned to Judge Marivic A. Cacatian-Beltran at Branch 3 after Judge Aquino's inhibition.
- Bail and Motion to Recall Warrants:** Lorica and Junio posted bail on May 24 and 25, 2011, respectively, after a warrant of arrest was issued. They also filed an urgent motion to hold proceedings and recall the warrants.
- DOJ Reassessment:** DOJ Secretary Leila de Lima reconsidered and set aside the denial of their appeal, indicating the lack of probable cause on August 8, 2011.
- Motion to Withdraw Information:** A joint motion to withdraw the filed informations was submitted to the RTC with a manifestation from Junio and Lorica to dismiss and cancel arraignment after Secretary De Lima's decision.
- RTC Response:** Judge Cacatian-Beltran denied the motion to withdraw the information, ruling independent of DOJ's findings, due to the acquired jurisdiction and evidence assessment, leading Junio and Lorica to file for administrative complaints against the judge for her alleged delays and overreach of authority.

**Issues:**

1. **Adjudicative Delay Compliance:** Whether Judge Cacatian-Beltran's delay in resolving the motion to withdraw informations exceeded constitutional and procedural time limits.
2. **Judicial Independence in Information Withdrawal:** Whether the judge overstepped her judicial bounds by refusing to withdraw the information despite DOJ's recommendation.
3. **Multi-Role Assumption Allegation:** Whether Judge Cacatian-Beltran inappropriately took on the role of both prosecutor and judge by insisting on a trial continuation.

**Court's Decision:**

1. **Delay in Resolution:** The Court acknowledged Judge Cacatian-Beltran resolved the motions beyond the mandated ninety-day period. While delay occurred, it found no evidence of malice or bad faith. Therefore, it adopted the OCA's recommendation to admonish her to adhere strictly to procedural timelines.
2. **Withdrawal of Information:** The Court upheld Judge Cacatian-Beltran's discretion to evaluate evidence independently and not purely rely on the DOJ's decision. The trial court retains the jurisdiction to determine the course of the case upon information filing, emphasizing judicial independence from the Executive.
3. **Prosecution and Judiciary Role Allegations:** The Court ruled that making an independent judicial assessment on whether to proceed to trial is within a judge's rights. Her actions displayed due assessments and are deemed within her judicial function, not entailing acting as both judge and prosecutor.

**Doctrine:**

- **Judicial Independence:** Once an information is filed, a trial court has the exclusive competence to manage case disposition, independent of the prosecution or DOJ recommendations.
- **Timeliness of Decisions:** Judicial decisions must occur within prescribed periods as mandated by the Constitution, ensuring no undue litigation delays.

**Class Notes:**

- **Constitutional Compliance:** Timely resolution adherence under Article VIII, Section 15(1) is non-negotiable.
- **Judicial Review and Independence:** The judiciary maintains autonomous decision-

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making authority post-information filing, reflective in this case by separating executive and judicial functions.

**\*\*Historical Background:\*\***

The case contextualizes the dynamic interplay between Executive prosecutorial powers and Judicial oversight in the Philippine legal system, emphasizing the Judiciary's role in safeguarding rights through evidence-based trials independent of public prosecutors' discretion. The judicial reaffirmation in Junio and Lorica underscores continuing efforts towards equitable justice amidst procedural delays.