

**\*\*Case Title:\*\*** Junio and Lorica vs. Judge Cacatian-Beltran, A.M. No. RTJ-12-3879

**\*\*Facts:\*\***

1. Claire Ann Campos, a 17-year-old student with a cleft palate, filed an affidavit-complaint against Sr. Remy Angela Junio and Dr. Josephine D. Lorica of St. Paul University of the Philippines for violations of R.A. No. 7610 (Child Abuse Law) and R.A. No. 7277 (Magna Carta for the Disabled) due to alleged discrimination and refusal of enrollment.
2. On August 22, 2008, the City Prosecutor's Office found probable cause and recommended filing charges against Junio and Lorica.
3. Junio and Lorica appealed to the DOJ, but their petition was denied on February 24, 2011.
4. On March 31, 2011, the prosecutor's office filed the corresponding informations.
5. Initially presided by RTC, Branch 4 Judge Lyliha Aquino, the cases were reassigned to Judge Marivic A. Cacatian-Beltran due to Aquino's inhibition.
6. Junio and Lorica sought reconsideration of their appeal denial, and while waiting for resolution, the RTC issued warrants of arrest on May 5, 2011, and both posted bail in May 2011.
7. DOJ Secretary De Lima later found no probable cause and ordered the withdrawal of the charges on August 8, 2011.
8. In August and September 2011, Junio and Lorica requested the RTC to dismiss the cases and cancel their arraignment based on the DOJ's resolution.
9. On January 6, 2012, the RTC denied these requests, leading to several motions and appeals that were similarly denied.

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

1. Whether Judge Cacatian-Beltran violated judicial conduct rules by delaying action on pending motions past the mandatory 90-day resolution period.
2. Whether the judge acted improperly in refusing to withdraw the informations despite the DOJ's contrary findings.

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

1. **\*\*Delay in Resolving the Motion:\*\*** The Supreme Court acknowledged the delay in resolving the motion to withdraw informations but found no bad faith or malice in Judge Cacatian-Beltran's actions. The delay was attributed to a procedural oversight without malicious intent. The judge was admonished to comply strictly with resolution periods, but no severe penalty was deemed necessary.
2. **\*\*Denial of Motion to Withdraw Informations:\*\*** The Court affirmed that a trial court is

13, 2014 (Case Brief,/ Digest)  
not bound by the DOJ's findings once the case is filed. The trial court has the jurisdiction to independently assess the evidence and can sustain charges based on its evaluation. Judge Cacatian-Beltran's denial was supported as it was based on a thorough examination of the case details, showing no abuse of discretion or judicial misconduct.

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

- **\*\*Judicial Independence in Probable Cause Determinations:\*\*** Once a criminal case is filed in court, the judge must make an independent decision regarding probable cause, which does not necessarily align with the recommendations of the prosecution or DOJ.
- **\*\*90-Day Rule in Judicial Decisions:\*\*** Lower courts must resolve motions and cases within 90 days to prevent delays in justice administration. However, sanctions on delay consider the presence or absence of bad faith or ulterior motives.

**\*\*Class Notes:\*\***

- **\*Probable Cause Assessment\*:** After a case is filed, the trial court has authority over the prosecution's recommendation on probable cause.
- **\*Administrative vs. Judicial Review\*:** Errors made in judicial capacity should be corrected through appeal, not administrative means, unless characterized by fraud or gross misconduct.
- **\*Case Management\*:** Judges must maintain organized docket systems to prevent unnecessary delays in judicial processes.

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

- The case reflects the ongoing issue of balancing prosecutorial discretion with judicial independence in the Philippine judicial system. It highlights the procedural checks in place to prevent abuse of discretion and ensure that the judiciary's role in overseeing the prosecution's actions remains intact. This also underscores the importance of swift judicial resolution to protect the rights of all parties involved.