

Title: Reyes v. Judge Duque, A.M. No. RTJ-07-2064 (Philippines)

Facts:

1. Susan O. Reyes, the complainant, filed a Verified Complaint against Judge Manuel N. Duque of RTC Branch 197, Las Piñas City. She alleged impropriety, corruption, and gross misconduct against Judge Duque.
2. The case arose from a land registration dispute where the Philippine Savings Bank filed a petition for a writ of possession against the spouses Choi, from whom Reyes claimed to have bought one of the contested properties.
3. Reyes petitioned to lift the writ of possession after claiming ownership of the property. During this time, she recounted that Judge Duque instructed her to bring money to his house in exchange for a favorable decision.
4. Reyes alleged that she delivered Php 20,000 and later Php 18,000 to Judge Duque, who demanded a total of Php 100,000. During her visit to his house, he attempted sexual advances towards her.
5. Judge Duque denied the allegations, claiming they were fabricated and questioned the OCA's jurisdiction after his retirement.
6. Reyes filed similar complaints, verified on different dates, prompting the OCA to maintain its jurisdiction since the initial complaint predated Judge Duque's retirement.
7. The OCA and an Investigating Justice evaluated the submissions, focusing on the charges of graft and corruption, impropriety, and gross misconduct.

Procedural Posture:

- Reyes filed several complaints against Judge Duque alleging misconduct before and after his retirement.
- The OCA conducted preliminary assessments and referred the case to a Court of Appeals Justice for investigation.
- Both the Investigating Justice and OCA prepared reports for the Supreme Court's consideration, recommending a penalty.

Issues:

1. Whether the retirement of Judge Duque affects the jurisdiction of the Supreme Court over the allegations of misconduct.
2. Whether substantial evidence exists to support allegations of graft, corruption, and impropriety against Judge Duque.
3. What penalties, if any, should be imposed based on the findings.

Court's Decision:

1. Jurisdiction: The Court ruled it retained jurisdiction because the complaint was filed before Judge Duque's retirement, satisfying procedural timeliness.
2. Graft and Corruption: Insufficient evidence existed to substantiate the claim that Judge Duque accepted money for favorable rulings. The charges were dismissed for lack of corroboration.
3. Impropriety and Gross Misconduct: The Court agreed with the OCA and Investigating Justice, finding Judge Duque liable based on substantial evidence of misconduct. His sexual advances constituted a breach of judicial standards.
4. Penalty: Judge Duque was fined Php 40,000, deducted from his retirement benefits, for violating expectations of judicial conduct.

Doctrine:

- The Court maintains jurisdiction in administrative cases against judges if complaints are filed while the judge is still in service.
- Even after retirement, judges can be held accountable for misconduct committed during their tenure.
- Judges must conduct themselves to promote confidence in the judiciary, maintaining both professional and personal propriety.

Class Notes:

- **Jurisdiction**: A complaint filed before a judge's retirement maintains the Court's jurisdiction.
- **Standard of Evidence**: Substantial evidence is the threshold for administrative liability.
- **Judicial Conduct**: Judges are expected to exemplify integrity and morality, avoiding any action that compromises public confidence.
- Legal Provision: Section 1, Canon 4, and Section 2 of the New Code of Judicial Conduct emphasize the expectation for judges to exhibit conduct consistent with judicial dignity and integrity.

Historical Background:

- The case arises from a context of heightened scrutiny over judicial conduct within the Philippines, reflecting ongoing efforts to strengthen judicial accountability and ethical adherence among members of the judiciary, resonating with broader themes of standards in public office during this period.