

****Title:****

Masayon and Compas v. Renta

****Facts:****

Don Alberto C. Compas passed away, leaving behind multiple parcels of land shared between two families. The heirs agreed initially on selling the properties and dividing the proceeds. On December 13, 2013, they executed an Extra-Judicial Deed of Partition with a Special Power of Attorney authorizing Clifford M. Compas to manage the sales. Clifford negotiated the sales of properties including the Kamalig Property to Melissa M. Masayon through a Deed of Conditional Sale dated January 7, 2015.

Clifford, learning through Ms. Siony Sia about the advantageous Conditional Mortgage Program (CMP), got heirs' consent and executed further documents to facilitate this. He managed to release 50% of the CMP proceeds to the heirs. When Clifford sought the remaining proceeds, SHFC President Atty. Cabling reported receiving a letter from Atty. Ronaldo E. Renta, representing the second family and prohibiting further releases. Renta insisted he was the new legal representative for the second family, leading to a dispute and halted payments.

Ms. Sia testified that Renta sought a P1,000,000.00 bribe to settle the heirs' dispute and showed continued insistence on receiving money in exchange for his clients' cooperation. Meanwhile, Masayon claimed that Renta, along with men, entered the Kamalig Property without permission, threatened the caretakers, and implied illicit activities.

In his defense, Renta claimed he was genuinely retained by the second family due to alleged misrepresentations in Clifford's documents. He asserted he acted to revoke Clifford's authority, wrote to the SHFC, and filed complaints against Clifford. Renta contested the bribery allegations, claiming lack of due process and asserting Ms. Sia did not provide a sworn statement.

****Procedural Posture:****

The Integrated Bar of the Philippines-Commission on Bar Discipline (IBP-CBD) found Renta liable and recommended suspension for one year. The IBP Board increased it to three years, rejecting Renta's motion for reconsideration. The case was elevated to the Supreme Court.

****Issues:****

1. Whether Atty. Renta should be held administratively liable for:

1. Alleged meddling in the affairs of Don Alberto's family.
2. Misrepresentation as the second family's attorney-in-fact.
3. Soliciting personal rewards for settling the dispute.
4. Using offensive language towards Melissa's caretakers.

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

- ****Issue 1.1 & 1.2 (Meddling and Misrepresentation):****

The Court found Renta legitimately retained by the second family, supported by a joint affidavit, indicating no unauthorized meddling or misrepresentation.

- ****Issue 1.3 (Soliciting Personal Rewards):****

Renta's solicitation of bribes was proven by Ms. Sia's clear testimony, reflecting dishonest, deceitful behavior violating Rules 1.01, 1.04 of Canon 1, and showing a disregard for fidelity to his clients under Canon 17 and Rule 7.03, Canon 7.

- ****Issue 1.4 (Offensive Language):****

Substantial evidence, including caretaker Abarca's affidavit and police certification, proved Renta's offensive conduct and threats, breaching Rule 8.01, Canon 8.

****Doctrine:****

- ****Rule 1.01, Code of Professional Responsibility (CPR):****

A lawyer shall not engage in unlawful, dishonest, immoral, or deceitful conduct.

- ****Rule 1.04, CPR:****

A lawyer shall encourage clients to avoid, end, or settle controversies if it admits fair settlement.

- ****Rule 7.03, CPR:****

A lawyer shall not engage in conduct that adversely reflects on his fitness to practice law.

- ****Canon 17, CPR:****

A lawyer owes fidelity to the client's cause and must be mindful of the trust and confidence reposed in them.

****Class Notes:****

- ****Key Elements:****

- Professional Misconduct
- Unauthorized Representation
- Solicitation of Bribes
- Offensive Language
- Fiduciary Duty

- ****Statutes or Provisions:****

- ****Rule 1.01, Rule 1.04, Rule 7.03, Canon 17, Canon 8 (CPR):****

These cover ethical standards mandating lawful, honest conduct, client loyalty, and fair dispute negotiation.

****Historical Background:****

The case reflects ongoing challenges in maintaining ethical standards within the legal profession, focusing on the responsibilities lawyers owe to their clients and the broader justice system. This decision underscores the Court's commitment to sanctioning professional conduct to uphold legal integrity in Philippine jurisprudence.