

“MR. ABENES,” COMPLAINANT, VS. JULIET L. CORPUZ, A LOCALLY FUNDED EMPLOYEE, AND ARMANDO G. YDIA, CLERK OF COURT IV, BOTH OF THE MUNICIPAL TRIAL COURT IN CITIES (MTCC), BAGUIO CI...

A.M. No. P-12-3081 (Formerly OCA IPI No. 12-3869-P), January 29, 2026

Ponente: SINGH, J.

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SINGH, J.:

This resolves the Complaint[1] filed by one "Mr. Abenes" (Abenes) against Juliet L. Corpuz (Juliet), a locally funded employee of the City Government of Baguio detailed to the Municipal Trial Court in Cities (MTCC) of Baguio City, and Armando G. Ydia (Armando), Clerk of Court (COC) IV of the same court. The charges involve Gross Misconduct constituting Violations of the Code of Conduct for Court Personnel, and Violations of the Anti-Graft and Corrupt Practices Act.[2]

The Facts

In his Complaint, Abenes alleged that he was married in 2005 at the MTCC of Baguio City, which was solemnized by Judge Danilo Camacho (Judge Camacho). However, when he requested a copy of his marriage certificate from the local civil registrar, he discovered that his marriage was not registered. When he inquired with the Office of the Clerk of Court of MTCC of Baguio City, COC Armando informed him that Juliet did not pay the corresponding registration fee.[3]

Abenes claimed that he had already given Juliet the PHP 500.00 necessary to register the marriage. He demanded that Juliet should register his marriage as he had already paid the registration fee. Juliet explained, however, that she could not comply with such demand as she was suspended from office at that time. She asked Abenes to pay PHP 5,000.00 so she could prepare another marriage certificate even without the need of a marriage license. Abenes threatened her that he would just file a complaint with the Court, but Juliet retorted that the Court does not have jurisdiction over her as she was an employee of the Baguio City Government who was only detailed to the MTCC.[4]

Abenes also alleged that Juliet should no longer be in government service since she was convicted of Estafa and suspended by the City Government on the ground of dishonesty for obtaining a loan from the Government Service Insurance System (GSIS) despite her disqualification.[5]

Aside from charging Juliet with corruption, Abenes likewise accused COC Armando of tolerating the alleged illegal acts of Juliet.[6]

The Office of the Court Administrator (OCA) referred Abenes' Complaint to Executive Judge Edilberto T. Claravall (Judge Claravall), Regional Trial Court (RTC) of Baguio City, for the conduct of a discreet investigation.

In his Report,[7] dated December 6, 2010, Judge Claravall found that Juliet received money from different couples whose marriages were solemnized by Judge Camacho from March 2005 to February 2006, but the same were not registered with the local civil registry since Juliet appropriated the money intended for payment of the registration fee. As for COC Armando, Judge Claravall found that he did not tolerate Juliet's illegal acts considering he also conducted his own investigation and issued a memorandum requiring her to submit an explanation why she failed to register the marriages. Thus, Judge Claravall recommended that Juliet not be given any work detail in the MTCC anymore and that she be returned to the City Government of Baguio. Judge Claravall also recommended that COC Armando should be sternly warned to closely monitor the activities of the personnel under his supervision.[8]

The OCA Legal Office likewise conducted a discreet investigation. In its Memorandum,[9] dated October 26, 2011, the OCA Legal Office found that the detail of Juliet to the MTCC of Baguio City was without the permission of the Court, in violation of Administrative Circular No. 28-2008,[10] thus rendering her detail null and void. Notwithstanding, the OCA Legal Office opined that, pursuant to the said Administrative Circular, Juliet is considered an officer of the court and is subject to the disciplinary jurisdiction of the Court, short of suspension and dismissal. With regard to COC Armando, the OCA Legal Office found that he should have known that a non-judicial personnel like Juliet has no place in the court since he has administrative supervision over all employees. The OCA Legal Office then recommended that Juliet's detail be terminated and that she and COC Armando be required to file their respective comments.[11]

The OCA submitted its Agenda Report,[12] dated April 2, 2012, which was approved by the Court in the Resolution,[13] dated August 15, 2012. There, the Court ordered Juliet and COC Armando to file their respective comments to the Complaint of Abenes, and directed the OCA to re-circularize Administrative Circular No. 28-2008.[14]

In his Reply,[15] dated October 3, 2012, COC Armando maintained that he never tolerated the illegal acts of Juliet. He contended that he even directed Juliet to explain why no administrative case should be filed against her for committing acts inimical to the best interest of the service. He also informed and warned certain banks with which Juliet might have transactions with. He also furnished the Baguio City Mayor a copy of Administrative Circular No. 28-2008 for his appropriate action. Finally, he stated that the incidents in question were committed when Juliet was not yet under his immediate supervision.[16]

In the Resolution,[17] dated August 28, 2013, the Court directed Juliet to show cause why she should not be held in contempt of court for failing to comply with the Resolution, dated August 15, 2012.[18] In another Resolution,[19] dated December 6, 2017, the Court reiterated its directive for Juliet to file her comment.

On February 23, 2021, the Court received a Letter-Request[20] from the heirs of COC Armando informing the Court that COC Armando passed away on March 12, 2016, and attached therewith was a copy of his death certificate.[21] They also requested the release of the benefits due their father. This was followed by a Motion,[22] dated March 22, 2021, praying for the dismissal of the case against COC Armando.[23]

The Court then referred the case to the Judicial Integrity Board (JIB) for report and recommendation.[24]

Report and Recommendation of the JIB

In his Report and Recommendation,[25] dated April 24, 2023, JIB Acting Executive Director James D.V. Navarrete recommended that the charges against COC Armando be dismissed due to his supervening death during the pendency of the case. He also recommended that, based on his finding that COC Armando was not a party to the illegal acts committed by Juliet, the case be dismissed as well for lack of merit. With respect to Juliet, he recommended that the case be referred to the MTCC of Baguio City for commencement of contempt proceedings.

He reasoned that even though Juliet is a locally-funded employee, the Court is not deprived of jurisdiction against her. The discreet investigation of Judge Claravall showed that she failed to register the marriages solemnized by Judge Camacho from March 2005 to February 2006. She also admitted that she demanded money from the concerned couples for the registration of their marriages.[26]

In the Report,[27] dated August 4, 2023, the JIB agreed with the findings and recommendations of the JIB Acting Executive Director, with modification as to the penalty against Juliet. The recommendation of the JIB reads, as follows:

ACCORDINGLY, we respectfully RECOMMEND to the Honorable Supreme Court that:

1)

The instant administrative case against Armando G. Ydia, former Clerk of Court IV, Office of the Clerk of Court, Municipal Trial Court in Cities, Baguio City, Benguet be DISMISSED in view of his death on March 12, 2016 and for lack of merit; and

2)

That [sic] respondent Juliet L. Corpuz, a former locally-funded employee, be found GUILTY of violation of Republic Act [No.] 3019 or the Anti-Graft and Corrupt Practices Act[,] and FINED in the amount of [PHP 150,000.00].[28] (Emphasis in the original)

The JIB held that the supervening death of COC Armando while the case was still pending before the Court is cause for dismissal of the case against him. Further, the complaint against COC Armando that he tolerated the illegal acts of Juliet lacks evidentiary support as there was no proof that he benefitted from the money collected by Juliet, the alleged acts were committed while Juliet was not yet under his immediate supervision, and he took several steps to address Juliet's actions.[29]

The JIB took note that Juliet is no longer employed with the Baguio City Government, thus referring the matter to said local government unit is no longer necessary.[30] The JIB held that even though Juliet is a locally-funded employee, it does not strip the Court of disciplinary jurisdiction over her. She has the status as an officer of the court and as such may be held accountable for her actions. Her conduct has cast disrespect to the Judiciary because insofar as the public is concerned, she was an employee of the MTCC. For the JIB, Juliet was administratively liable for Violation of Section 3(c) of Republic Act No. 3019.[31]

The Issue

Are Juliet and COC Armando administratively liable for the acts complained of?

The Ruling of the Court

The Court adopts the findings and recommendation of the JIB with modifications.

The case against COC Armando is dismissed due to his supervening death

On October 28, 2025, while this case was still pending, the Court promulgated the 2025 Code of Conduct and Accountability for Court Officials and Personnel (CCACOP).[32] The Court was cognizant of "substantial developments in law, technology, and socio-economic structures which have materially altered the landscape within which court officials and personnel perform their duties and responsibilities[.]"[33] To address these issues, the Court saw it fit to modernize the existing ethics code governing the conduct of court personnel. Thus,

the Court promulgated the CCACOP, which aims to "respond to these developments and to ensure continued fidelity to the values of competence, integrity, and accountability within the Judiciary." [34]

In accordance with General Provisions, Section 1 of the CCACOP, [35] the said Code shall be applied to all pending cases before the Court. Thus, the CCACOP shall be applied to resolve this case.

Canon V, Section 2(b) of the CCACOP reads:

SECTION 2. Effect of death, retirement, and separation from service to the proceedings.—

....

(b) . . .

Disciplinary proceedings instituted against court officials and personnel who die during the pendency of the proceedings shall be dismissed with prejudice, but subject to any surviving civil claim against the estate of the deceased or the latter's legal heirs or representatives. (Emphasis supplied)

The provision provides that the death of the respondent in an administrative case before its final resolution is a cause for its dismissal. Similar to criminal prosecutions where the accused is considered innocent until proven guilty, a respondent in an administrative case similarly enjoys the right to presumption of innocence pending final judgment. [36]

Considering the supervening death of COC Armando on March 12, 2016, as evidenced by the death certificate submitted by his heirs, the Court has no reason but to order the dismissal of the administrative case against him.

As correctly found by the JIB, there is a dearth of evidence that would tie COC Armando with the acts performed by Juliet. Upon learning that couples were complaining about the non-registration of their marriages, COC Armando issued a memorandum to Juliet ordering her to explain why she failed to register the marriages with the local civil registry. More, these acts were committed by Juliet prior to her detail to the office of COC Armando. Thus, it can be reasonably concluded that COC Armando did not tolerate the illegal acts committed by Juliet as alleged by Abenes.

It must be noted, however, that the OCA Legal Office observed that COC Armando may have committed certain infractions with regard to the detail of Juliet to the MTCC of Baguio City.

Pertinent provisions of Administrative Circular No. 28-2008 read as follows:

In the interest of the service, the following guidelines shall be observed in the detail of locally-funded employees to the lower courts:

1. No detail of locally-funded employees to the lower courts shall be allowed without first obtaining permission from the Supreme Court (SC) through the Office of the Court Administrator (OCA).
2. The request for the detail of locally-funded employees shall be made by the Presiding Judge for those in the court branches and the Executive Judge for those in the Office of the Clerk of Court (OCC) and shall be submitted to the Supreme Court through the Office of the Court Administrator for approval. The request shall contain the following information:
 - a. Court caseload
 - b. Reason or necessity for the detail
 - c. Name, position, title, and duties to be assigned
 - d. Duration of the detail

....

11. Non-compliance and/or violation of this circular by the judge, court personnel or locally-funded employee shall be a ground for disciplinary action. (Emphasis supplied)

The clerk of court is indispensable in the operation of a court. That is why the clerk of court is considered the "chief administrative officer" of their respective courts, and who are vested with vital functions in the prompt and sound administration of justice.[37] Included in the duties of the clerk of court is the administrative supervision of the personnel employed or assigned in his or her court. As explained in the 2002 Revised Manual for Clerks of Court:

A Judge alone cannot make the Court function as it should. In the over-all scheme of judicial business, many non-judicial concerns, intricately and inseparably interwoven with the trial and adjudication of cases, must perforce be performed by other individuals that make up the team that complements the Court. Of these individuals, the Clerk of Court eclipses the others in function, responsibilities, importance and prestige.

The Clerk of Court has general administrative supervision over all the personnel of the Court. As regards the Court's funds and revenues, records, properties and premises, said officer is the custodian.

The nature of the work and of the office mandates that the Clerk of Court be an individual of competence, honesty, and integrity.[38] (Emphasis supplied)

The OCA Legal Office found that the initial detail of Juliet to the MTCC of Baguio City was not approved by the Court through the OCA. Likewise, the OCA Legal Office found that Juliet was detailed anew to the Office of the Clerk of Court of the same MTCC notwithstanding the lack of approval by the Court, and with information that she had been convicted (albeit pending appeal) of Estafa by the RTC, as well as being found administratively guilty of Dishonesty by the City Government of Baguio for an anomalous transaction with the GSIS.

As Clerk of Court, COC Armando ought to have known that the detail of Juliet to his office was without the permission of the Court, through the OCA, in violation of Administrative Circular No. 28-2008. In addition, the detail of a person who had been convicted of a crime, and had been administratively sanctioned by her employer, should have raised a red flag as to the appropriateness of such detail. In allowing the detail of Juliet, whose questionable character had tarnished the image of the court where she served, COC Armando may have committed an administrative infraction.

Thus, the Court deems it proper not to adopt the recommendation of the JIB to dismiss the case against COC Armando for lack of merit. Nevertheless, the supervening death of COC Armando, as discussed, is sufficient to dismiss the case against him, with prejudice, in accordance with Canon V, Section 2(b) of the CCACOP.

The Court adopts the findings of the OCA and JIB with regard to the acts committed by Juliet

The Court finds no reason to disturb the findings of the OCA and the JIB. These bodies have found that Juliet committed acts that put the image of the courts in a bad light, thereby eroding the trust the people had reposed in the Judicial Branch.

First, Juliet pocketed the registration fees of couples whose marriages have already been solemnized, including that of Abenes. The investigation of Judge Claravall revealed Juliet's admission that she had collected the registration fees but failed to register the marriages. She then promised to register them but she requested to pay the solemnization fees gradually. The unregistered marriage contracts remained to be in her possession.[39] This

shows that Juliet malversed the funds that have been paid to her with the expectation that she would register the marriages. This situation was aggravated by Juliet's lack of explanation as to why she used the money for other purposes than the registration of the marriages.

Second, Juliet did not deny that she asked Abenes for additional money to process the registration of his marriage. The fact is that Abenes had already paid the registration fee and that Juliet had collected the same. Juliet undeniably used her position to illicitly gain pecuniary benefit for herself at the expense of oblivious couples who expectedly put their trust in her by reason of her work in the court. Her act of requesting additional money from Abenes for the purpose of processing his marriage certificate reeks of graft and corruption.

Finally, the Court has previously taken judicial notice that most of the courts are housed in the same building where offices of the local government units are likewise located. Hence, it is not easy for ordinary people to distinguish employees of the judiciary from employees of the local government unit. They could only rely on the representation of people they encounter.[40] Indeed, Juliet, although an employee of the City Government of Baguio, performed functions within the MTCC. Notwithstanding her void detail to the MTCC, Juliet was, to the eyes of the public, a court employee. Thus, Juliet's actions have tarnished the reputation not only of the MTCC where she served, but also the entire Judiciary.

Considering, however, that Juliet was a locally-funded employee whose detail to the MTCC of Baguio City was without the approval of the Court, the Court cannot exercise disciplinary jurisdiction over her. Nevertheless, she can be cited in contempt of court, as will be discussed hereafter.

The Court cannot exercise administrative supervision over a locally-funded employee whose detail was not approved by the Court; nevertheless, the Court can cite such employee in contempt of court

The Court recognizes the situation where certain local government units have offered assistance to First and Second Level Courts within their territorial jurisdiction to aid in the overall administration of justice. This assistance may come in the form of workforce augmentation, i.e., the detail of employees of the local government unit to such courts. In this sense, a "locally-funded employee" means an individual who is employed by and receives his or her salary and other benefits from the local government unit.

In the case of *Malanyaon v. Galang*,[41] which was decided in 1978, the Court found the Deputy Sheriff of Manila guilty of negligence in the performance of official functions, particularly his failure to serve a writ of execution at the defendant's place of business without justifiable cause. Notwithstanding that the Deputy Sheriff was appointed by the Mayor of the City of Manila, this did not preclude the Court from exercising its disciplinary jurisdiction over the said individual. Thus said the Court:

Nevertheless, inasmuch as respondent herein was appointed to an office which carries with it duties and functions related to the administration of justice, he has the status of an officer of the court, and as such can be held accountable, short of being dismissed or suspended from office, to the court he serves as well as to this Tribunal for any negligence or conduct which impedes the efficient and speedy administration of justice. To hold otherwise would be to weaken the role of our courts as effective guardians of the law and dispensers of justice.[42]

In 2008, then Chief Justice Reynato Puno issued, with the approval of the Court, Administrative Circular No. 28-2008, which provided the guidelines in the detail of locally-funded employees to First and Second Level Courts. Pertinent portions of the said Administrative Circular with respect to the Court's power of administrative

supervision over such employees read as follows:

6. During the period of the detail, the concerned LGU relinquishes its administrative supervision over the locally-funded employees to the SC. Administrative supervision refers to the authority to direct the performance of duties; restrain the commission of acts; and review, approve, reverse or modify acts or decisions of the detailed employee. In this regard, the SC through the lower court has the responsibility to monitor the punctuality and attendance of the detailed locally-funded employees, approve request for leave, evaluate their performance, grant authority to travel and exercise other acts necessary to effectively supervise the employees.

Prior to the effectivity of the detail, and insofar as those already detailed before the issuance of this administrative circular, the Presiding Judge/Executive Judge shall request the concerned LGU to furnish the lower court with a certification of the available sick and vacation leave credits of the detailed locally-funded employee. In the event the Presiding Judge/Executive Judge approves the request for leave by the detailed employee, a copy of the same shall be submitted by the Clerk of Court to the concerned LGU.

7. With respect to the personnel actions such as promotion, transfer, renewal, demotion, upgrading and reclassification of positions and the like, which requires the issuance of an appointment, and other personnel movement such as reassignment, detail, secondment, job rotation and designation which do not necessarily require the issuance of an appointment, including salary adjustment, step-increment and monetization of leave credits concerning the detailed locally-funded employee, the same shall still be under the jurisdiction of the concerned LGU.

8. Inasmuch as the locally-funded employee is detailed to an office which carries with it duties and functions related to the administration of justice, such employee has the status of an officer of the court, and as such can be held accountable, short of being dismissed or suspended from office, to the court he serves as well as to the Supreme Court for any negligence or conduct which impedes the efficient and speedy administration of justice., following the Supreme Court ruling in *Esperanza Malanyaon vs. Rufino Galang*, A.M. No. P-133, July 20, 1978.

Complaints against locally-funded employee shall be filed before the Supreme Court through the Office of the Court Administrator, except for offenses classified under Civil Service Rules as light offenses which shall be filed with the Office of the Executive Judge, who shall conduct an investigation pursuant to A.M. No. 03-8-02-SC otherwise known as Guidelines on the Selection and Appointment of Executive Judges and Defining their Powers, Prerogatives and Duties. This is without prejudice to the authority of the concerned LGU to discipline locally-funded employee.

As provided for in the Administrative Circular, the local government unit to which the locally-funded employee belongs temporarily loses its power of administrative supervision for the duration of the detail of such employee to the First or Second Level Court, as such power becomes vested in this Court. This is so because the locally-funded employee is considered an "officer of the court" and can thus be held accountable for actions committed during the detail short of imposing the penalties of suspension and dismissal from the service.

In 2014, the Court penalized an RTC judge for failing to comply with the requirements under Administrative Circular No. 28-2008. In *Office of the Court Administrator v. Judge Larida, Jr.*,^[43] the Court meted the penalty of suspension for two months against Presiding Judge Edwin G. Larida, Jr. One of the grounds for his suspension is his act of allowing the detail of locally-funded employees without first obtaining permission from the Court. It was ruled that the responsibility for submitting the inventory of locally-funded employees was vested in the judge and not the clerk of court, such that failure to send such inventory constitutes noncompliance with the Administrative Circular. Moreover, the judge has the responsibility to monitor that the locally-funded employees may only do clerical work, as the confidentiality of court records must be observed.^[44]

Then, in 2020, the Court was confronted with the scenario of whether it can discipline a locally-funded employee whose detail had no prior approval. In the case of Anonymous Complaint Against Clerk of Court V Atty. Cuenco, et al. of RTC, Branch 72, Malabon City,[45] a locally-funded employee of the City of Malabon who was detailed to the RTC of Malabon without the approval of the Court was found guilty of violating reasonable office rules and regulations for using the court computer and printer to prepare and print pleadings for litigants. There, the Court explained that, notwithstanding that it cannot exercise administrative supervision over the locally-funded employee since her detail was without the Court's approval, the latter can still be held accountable for her acts committed against the Judiciary. Thus, the Court referred the case against the locally-funded employee to the RTC of Malabon City for commencement of contempt proceedings. The Court explained, thus:

While De Guzman was never an employee of the Court, still she committed violations of the court's reasonable office rules and regulations when she used the court computer and printer to prepare and print pleadings for the litigants. Her actions may be considered as improper conduct tending, directly or indirectly, to impede, obstruct, or degrade the administration of justice," thus, a ground for indirect contempt. While the Court cannot exercise administrative supervision over her since, based on the records, her detail to the said RTC was not even approved, therefore, she is not a court employee, still she must be held accountable for her acts of disrespect towards the Judiciary. Also, since according to De Guzman she is no longer connected with any government institution, a recommendation of referral to the local government unit would not serve any practical purpose. For this reason, the Court deems it proper to refer De Guzman's case to the Presiding Judge of Malabon RTC, Branch 72 and direct said Judge to commence contempt proceedings against De Guzman. The findings in this administrative case may be taken cognizance of by said court in the contempt proceedings.[46] (Emphasis supplied)

In 2022, the Court decided the case of Sagum v. Castillo.[47] There, the Court adopted the report of the JIB which found that the latter had no jurisdiction over a locally-funded employee in accordance with Rule III, Section 1 of the Internal Rules of the JIB.[48] The OCA had certified that the detail of the locally-funded employee did not have permission from the Court. Nevertheless, it was ruled that "[t]his Court must not let any person, be the employee or not of the judiciary, to tarnish judicial norms that this Court has sought to establish and preserve. Appropriate measures must be taken to protect the institution." [49] Thus, the Court referred the administrative complaint against the locally-funded employee to the proper office in the local government unit for appropriate action, and ordered the commencement of contempt proceedings or a determination of being barred for future employment in the Judiciary against such employee in the RTC.

The power of the Court to exercise administrative supervision over all courts and their personnel is one that is constitutionally granted.[50] As such, the Court oversees the court personnel's compliance with all laws, rules and regulations, and takes proper administrative action against them for any violation or infraction.[51]

Administrative Circular No. 28-2008 provides that no detail of any locally-funded employee shall be allowed unless there is approval by the Court through the OCA. The provision is unambiguously mandatory, which means that any violation renders the act illegal and void.[52] Thus, the detail of any locally-funded employee without Court approval is without any force and effect. Without a valid detail, the Court is precluded from exercising its power of administrative supervision, which includes the power to discipline, over such locally-funded employee.

Therefore, the Court cannot exercise administrative supervision over a locally-funded employee who failed to secure the Court's approval for his or her detail since there is no valid relationship that would support the exercise of such power. The detail is patently void, hence the Court cannot exercise its disciplinary jurisdiction over a person whose relationship with the Court is legally nonexistent. Disciplinary jurisdiction remained with the local government unit where he or she belongs. Any administrative infraction committed by such employee during his

or her actual service in the First or Second Level Court may be referred by such court to the local government unit concerned for appropriate action.

As held by the Court in *Anonymous Complaint Against Clerk of Court Atty. Cuenco and Sagum*, a locally-funded employee is not considered a "court employee" because the detail was not approved by the Court. This basically means that the Court did not consent to the establishment of an administrative relationship between it and the locally-funded employee. As a result, the Court did not acquire disciplinary jurisdiction over such employee. Thus, the Court cannot heed the JIB's proposal to impose the penalty of payment of fine in the amount of PHP 150,000.00 against Juliet.

Notwithstanding, the Court has the inherent power to cite Juliet in contempt of court for her actions which tarnished the image of the Judiciary. The Court has discussed the concept of contempt of court as follows:

Contempt of court is defined as a disobedience to the Court by acting in opposition to its authority, justice[,] and dignity. It signifies not only a willful disregard or disobedience of the court's orders, but such conduct which tends to bring the authority of the court and the administration of law into disrepute or in some manner to impede the due administration of justice. Contempt of court is a defiance of the authority, justice or dignity of the court; such conduct as tends to bring the authority and administration of the law into disrespect or to interfere with or prejudice party litigants or their witnesses during litigation. The power to punish for contempt is inherent in all courts and is essential to the preservation of order in judicial proceedings and to the enforcement of judgments, orders, and mandates of the court, and consequently, to the due administration of justice.[53] (Emphasis supplied)

The power of contempt has twofold purposes: (a) to protect the dignity, authority, and administration of justice through the punishment of those who disrespect or seek to put them in disrepute, and (b) to compel the performance of an act or duty which one refuses to perform.[54]

Rule 71, Section 3 of the Rules of Court enumerates the grounds for indirect contempt:

- (a) Misbehavior of an officer of a court in the performance of his official duties or in his official transactions;
- (b) Disobedience of or resistance to a lawful writ, process, order, or judgment of a court, including the act of a person who, after being dispossessed or ejected from any real property by the judgment or process of any court of competent jurisdiction, enters or attempts or induces another to enter into or upon such real property, for the purpose of executing acts of ownership or possession, or in any manner disturbs the possession given to the person adjudged to be entitled thereto;
- (c) Any abuse of or any unlawful interference with the processes or proceedings of a court not constituting direct contempt under section 1 of this Rule;
- (d) Any improper conduct tending, directly or indirectly, to impede, obstruct, or degrade the administration of justice;
- (e) Assuming to be an attorney or an officer of a court, and acting as such without authority;
- (f) Failure to obey a subpoena duly served;
- (g) The rescue, or attempted rescue, of a person or property in the custody of an officer by virtue of an order or process of a court held by him. (Emphasis supplied)

As discussed, Juliet committed transgressions that amount to disrespect toward the Judiciary. Since the image of a court is necessarily mirrored in the official and personal conduct of all individuals working there,[55] Juliet should be made liable for her conduct which degraded the administration of justice and tarnished the reputation of the Judiciary.

Since the JIB found that Juliet is not anymore connected with the City Government of Baguio, referral of the administrative case to the local government unit would not serve any practical purpose. Nevertheless, similar to the disposition made by the Court in Anonymous Complaint Against Clerk of Court IV Atty. Cuenco and Sagum, the Court deems it proper to refer this case to the Executive Judge of the MTCC of Baguio City to commence contempt proceedings against Juliet. The findings in this administrative case may be taken cognizance of by the said court in the contempt proceedings.

A Final Note

The Court echoes the disquisition made by Senior Associate Justice Marvic M.V.F. Leonen in his Concurring Opinion[56] in Anonymous Complaint Against Clerk of Court IV Atty. Cuenco. While the support of the various local government units is pragmatic and appreciated, the Court recognizes that such assistance has consequences regarding the Judiciary's independence and the impartiality of the judges of First and Second Level Courts, especially when it comes to cases where the local government unit and its officials are involved. Thus, it is well to remind the different administrative units of the Court, including the OCA, to formulate and implement plans and programs that would enable the Court to shift from the situation where local government units provide additional workforce, to a more ideal one where the personnel of First and Second Level Courts are all employees of the Judiciary.

In the meantime, it is also proper to remind the judges of First and Second Level Courts of their duty to comply with the provisions of Administrative Circular No. 28-2008, especially in screening locally-funded employees to be detailed in their respective courts, and in securing the required approval from the Court, through the OCA. Failure of these judges to comply with the provisions of the said Circular is cause for disciplinary action against them. All locally-funded employees presently serving in the First and Second Level Courts whose detail did not have permission from the Court, through the OCA, should be instructed by the concerned judges to return to their respective local government units.

ACCORDINGLY, the Report, dated August 4, 2023, of the Judicial Integrity Board is ADOPTED WITH MODIFICATIONS. The Court rules that:

(1)

The administrative case against Armando G. Ydia, former Clerk of Court IV, Municipal Trial Court in Cities, Baguio City, is DISMISSED due to his death; and

(2)

The Executive Judge of the Municipal Trial Court in Cities, Baguio City, is DIRECTED to commence contempt proceedings or a determination of being barred from future employment in the Judiciary against Juliet L. Corpuz.

The Office of the Court Administrator is INSTRUCTED to reiterate Administrative Circular No. 28-2008 for information and strict compliance by judges of First and Second Level Courts.

SO ORDERED.

Caguioa (Chairperson), Inting, Gaerlan, and Dimaampao, JJ., concur.

[1] Rollo, p. 6.

[2] Republic Act No. 3019 (1960), Anti-Graft and Corrupt Practices Act.

[3] Rollo, p. 216.

[4] Id. at 216-217.

[5] Id. at 217.

[6] Id.

[7] Id. at 43-45.

[8] Id. at 217-218.

[9] Id. at 108-116.

[10] Administrative Circular No. 28-2008, Guidelines in the Detail of Locally-Funded Employees to the Lower Courts.

[11] Rollo, p. 116.

[12] Id. at 1-4.

[13] Id. at 118-119.

[14] See Administrative Circular No. 89-2012. Reiteration of Administrative Circular No. 28-2008[,] dated March 11, 2008 (Re: Guidelines in the Detail of Locally-Funded Employees to the Lower Courts).

[15] Rollo, pp. 120-124.

[16] Id. at 219-220.

[17] Id. at 142.

[18] Id. at 220.

[19] Id. at 145-146.

[20] Id. at 180.

[21] Id. at 188-189.

[22] Id. at 195-196.

[23] Id. at 220.

[24] Id. at 221.

[25] Id. at 209-215.

[26] Id. at 221.

[27] Id. at 216-226. Penned by retired Associate Justice Angelina Sandoval-Gutierrez, Vice Chairperson, and concurred in by retired Associate Justices Romeo J. Callejo, Sr., Chairperson, and Sesinando E. Villon, Rodolfo A. Ponferrada, and Cielito N. Mindaro-Grulla, Members, of the Judicial Integrity Board.

[28] Id. at 215.

[29] Id. at 222.

[30] Id.

[31] Republic Act No. 3019 (1960), sec. 3(c) states:

In addition to acts or omissions of public officers already penalized by existing law, the following shall constitute corrupt practices of any public officer and are hereby declared to be unlawful:. . .

(c) Directly or indirectly requesting or receiving any gift, present or other pecuniary or material benefit, for himself or for another, from any person for whom the public officer, in any manner or capacity, has secured or obtained, or will secure or obtain, any Government permit or license, in consideration for the help given or to be given, without prejudice to Section thirteen of this Act.

[32] A.M. No. 25-06-11-SC (2025).

[33] A.M. No. 25-06-11-SC (2025), preamble.

[34] Id.

[35] A.M. No. 25-06-11-SC (2025), General Provisions, sec. 1 states:

The Code shall be applied to all pending and future cases, except to the extent that in the opinion of the Supreme Court, its retroactive application would not be feasible or would work injustice, in which case the procedure under which the cases were filed shall govern.

[36] Re: Request of Judge Nino A. Batingana for Extension of Time to Decide Civil Aspect of Criminal Case Numbers 4514, 4648, and 4649, 895 Phil. 1, 8 (2021) [Per J. Inting, Third Division].

[37] Re: Report on the Financial Audit Conducted at the Municipal Trial Court, Baliuag, Bulacan, 753 Phil. 31, 37 (2015) [Per C.J. Sereno, First Division].

[38] Office of the Court Administrator v. Salunoy, 870 Phil. 142, 153 (2020) [Per Curiam, En Banc].

[39] Rollo, p. 44.

[40] Sagum v. Castillo, 931 Phil. 742, 746 (2022) [Per J. J. Lopez, En Banc].

[41] 173 Phil. 312 (1978) [Per J. Muñoz Palma, First Division].

[42] Id.

[43] 729 Phil. 21 (2014) [Per J. Bersamin, En Banc].

[44] Id. at 33-34.

[45] 879 Phil. 73 (2020) [Per Curiam, En Banc].

[46] Id. at 105-106.

[47] 931 Phil. 742 (2022) [Per J. J. Lopez, En Banc].

[48] A.M. No. 18-01-05-SC (2020), Rule III, sec. 1 states:

The Judiciary Integrity Board shall exercise jurisdiction over administrative complaints or referrals against the following:

- Presiding Justices and Associate Justices of the Court of Appeals, the Sandiganbayan, the Court of Tax Appeals, and the Shari'ah High Court and Judges of the lower courts, including Shari'ah District or Circuit Courts, and the officials and employees of the Judiciary, Court Administrator, Deputy Court Administrators, Assistant Court Administrators and their personnel; and

- Court officials and employees involving violations of the Code of Conduct for Court Personnel and/or the Civil Service Laws and Rules.

[49] *Sagum v. Castillo*, 931 Phil. 742, 746 (2022) [Per J. J. Lopez, En Banc].

[50] CONST., art. VIII, sec. 6 states:

The Supreme Court shall have administrative supervision over all courts and the personnel thereof.

[51] *Re: Request for Guidance/Clarification on Sec. 7, Rule III of RA No. 10154*, 718 Phil. 503, 505 (2014) [Per J. Perlas-Bernabe, En Banc].

[52] CIVIL CODE, art. 5 states:

Acts executed against the provisions of mandatory or prohibitory laws shall be void, except when the law itself authorizes their validity.

[53] *Pilipinas Shell Petroleum Corporation v. Morales*, 941 Phil. 533, 543 (2023) [Per J. Leonen, Second Division], citing *Limbona v. Lee*, 537 Phil. 610, 618 (2006) [Per J. Ynares-Santiago, First Division].

[54] *ABS-CBN Corporation v. Ampatuan, Jr.*, 941 Phil. 182, 194 (2023) [Per J. Leonen, En Banc].

[55] *Office of the Court Administrator v. Mallare*, 461 Phil. 18, 27 (2003) [Per J. Callejo, Sr., Second Division].

[56] J. Leonen, *Concurring Opinion in Anonymous Complaint Against Clerk of Court IV Atty. Cuenco*, 879 Phil. 73, 121 (2020) [Per Curiam, En Banc].

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