LEONILA R. PEDRO, COMPLAINANT, VS. LORNA M. CLEMENTE, COURT STENOGRAPHER I, MUNICIPAL CIRCUIT TRIAL COURT, ROXAS-QUIRINO, ISABELA, RESPONDENT.

A.M. No. P-26-344 (Formerly JIB FPI No. 22-175-P), April 29, 2026

Ponente: SINGH, J.

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SINGH, J.:

This resolves the Administrative Complaint filed by Leonila R. Pedro (Pedro) against Lora M. Clemente (Clemente), Court Stenographer I of the Municipal Circuit Trial Court (MCTC), Roxas-Quirino, Isabela, for gross misconduct constituting violations of the Code of Conduct for Court Personnel (CCCP), direct bribery and violation of the Anti-Graft and Corrupt Practices Act, grave abuse of authority and/or prejudicial conduct that gravely besmirches or taints the reputation of the service.[1]

The Facts

In an Indorsement,[2] dated September 22, 2022, Court Administrator Raul B. Villanueva[****] referred to the Judicial Integrity Board (JIB) for its appropriate action, the Salaysay-Reklamo,[3] dated August 19, 2022, of Pedro against Clemente.[4] In her Complaint, Pedro narrates the circumstances surrounding the case.

Version of the complainant

Pedro first met Clemente when Mario Coloma (Coloma), a friend of Pedro's husband, introduced them to each other. Pedro had been looking for someone who can help her recover the PHP 520,000.00 owed to her by Marlene Sagun (Sagun). Coloma arranged the meeting,[5] and Pedro alleged that Clemente met her at the MCTC Roxas-Quirino Branch and offered to help.[6] Pedro felt she could trust Clemente because she was a court staff.[7]

In the case involving Sagun, Pedro claimed that Clemente told her that she must first pay docket fees and other "SOPs," which seemed to refer to other necessary processing fees. Pedro asked Clemente for a breakdown of these fees, and she was given a piece of paper containing a total amount of PHP 20,000.00. This was sufficient to convince Pedro, and she allegedly paid the PHP 20,000.00 to Clemente.[8]

Sometime in April 2019, Pedro claimed that she received text messages and calls from Clemente informing her that Sagun was willing to settle her obligation and return the PHP 520,000.00, which is the amount of the debt. However, Pedro wanted to collect the interest due to her and her other expenses, including the PHP 20,000.00 that she had paid to Clemente. Pedro explained, however, that Clemente convinced her to accept Sagun's offer.[9]

On Clemente's alleged instructions, Pedro went to the MCTC Roxas-Quirino Branch to meet Sagun. There, Pedro received the PHP 520,000.00 from Sagun's husband. After prodding by Clemente, Pedro also signed a waiver which indicated that she will no longer sue Sagun. Meanwhile, Pedro alleged that Clemente then asked for PHP 30,000.00 as an "SOP" to be paid to the court because she had already collected the claims she sought.[10] In her joy for having collected the debt from Sagun,[11] Pedro readily agreed and allegedly handed the money to

Clemente, who put the cash in her pocket. This was sometime towards the end of April 2019.[12]

Pedro claimed that, in total, she gave PHP 50,000.00 to Clemente for her assistance in the case involving Sagun.[13]

Thereafter, Pedro again communicated with Clemente for another legal concern. Pedro had been issued two allegedly unfunded checks by Corazon Pineda (Pineda) amounting to PHP 1.2 million and PHP 200,000.00. Pedro claimed that Clemente again offered her assistance and instructed her to prepare photocopies of the checks. Clemente also told her that a warrant of arrest may be issued against Pineda for violation of Batas Pambasa Blg. 22.[14]

Pedro's allegations stated that a week later, she received a text message from Clemente asking her to go to MCTC Roxas-Quirino Branch. There, Pedro was informed by Clemente that she needed to pay a purported "package fee" for the case amounting to PHP 200,000.00, which includes another PHP 200,000.00 if Pedro successfully collects from Pineda. Pedro then asked Clemente for a breakdown of the package fee, and she was allegedly handed a piece of paper containing the breakdown of fees totaling to PHP 197,200.00.[15]

On May 7, 2019, Pedro received another text message from Clemente informing her that she must also pay PHP 2,000.00 for the "subscription" of the affidavits. The next day, Clemente told Pedro to add another PHP 1,070.00 to the total to cover the mailing costs.[16] By then, Pedro produced PHP 89,200.00, after borrowing from family and people she knew,[17] and allegedly gave this to Clemente as partial payment for the different fees asked of her. Pedro, meanwhile, assured Clemente that she would take care of the small claims and Batas Pambansa Blg. 22 cases against Pineda.[18]

After about a week or two, Pedro claimed that she returned to the MCTC Roxas-Quirino Branch and delivered the final payment of PHP 110,000.00 to Clemente. In return, according to Pedro, Clemente gave her two receipts under the name of Atty. David S. Salibad, Jr. (Atty. Salibad) in the amount of PHP 110,000.00 and PHP 30,000.00. According to Pedro, Clemente explained to her that Atty. Salibad would represent her in her cases.[19] However, Pedro recounted that she was unaware that she had a lawyer in the first place in the Pineda case, because not once had Atty. Salibad or any lawyer met her about the case.[20]

By October 2019, Pedro returned to the MCTC Roxas-Quirino Branch following a notice issued by the court for the small claims case, but she was surprised when the judge in that case scolded her for allegedly filing the small claims and Batas Pambansa Blg. 22 cases simultaneously. However, Pedro could offer no response as she was clueless as to what was filed in court on her behalf by Clemente.[21]

Having her small claims case dismissed immediately, Pedro sent a text message to Clemente on October 12, 2019. Clemente tried to assuage Pedro's feelings by allegedly explaining that the dismissal of the small claims case meant only a loss of PHP 24,000.00 for Clemente.[22]

Subsequently, after being prodded by a family member to double-check the status of her case and look more closely at the documents being filed on her behalf,[23] Pedro went to the MCTC Roxas-Quirino Branch to secure copies of the records of her cases. There, Pedro found out that she should have only paid PHP 26,700.00 for the small claims and Batas Pambansa Blg. 22 cases. After many attempts by Pedro to claim the excess payment from Clemente, the latter eventually agreed to return PHP 24,000.00,[24] representing what Clemente referred to as Pedro's actual loss.[25]

Clemente then paid in piecemeal installments from May 18, 2021 until she was able to pay off the PHP 24,000.00 on September 22, 2021.[26] However, Pedro sought assistance from the Office of the Mayor of the Municipality of Roxas, Isabela, to recover the excess payments.[27] Despite the mediation by the municipal administrator,

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Clemente only provided official receipts under the name of Atty. Salibad to Pedro as proof of payment.[28] One, dated September 18, 2019, was for attorney's fees in the amount of PHP 110,000.00,[29] and another, dated May 8, 2019, for acceptance fee in the amount of PHP 30,000.00.[30]

Pedro then went to Atty. Salibad, and there the lawyer showed his own surprise. According to Atty. Salibad, he did not receive the amounts in the receipts, but only much lower amounts.[31]

As time went on and no news about the Pineda case came, Pedro sought to collect from Clemente through a demand letter, which the latter refused to accept whether by registered mail or through personal service.[32] Pedro claimed that she has not yet been able to recover the excess fees that she paid Clemente despite her efforts.[33] Pedro felt betrayed by the documents and explanations of Clemente which convinced her to trust that the amounts asked of her were the real fees to be paid in court.[34]

The JIB required Clemente to file a Comment through an Indorsement,[35] dated November 24, 2022, for the following charges against her: (1) Gross Misconduct constituting Violation of the CCCP; (2) Direct Bribery and Violations of the Anti-Graft and Corrupt Practices Act; and (3) Grave Abuse of Authority and/or Prejudicial Conduct that Gravely Besmirches or Taints the Reputation of the Service.[36]

Version of the respondent

Clemente, in her Verified Comment,[37] dated December 22, 2022, confirmed that she is acquainted with Pedro, albeit through a different person.[38] Clemente insisted that she was innocent of the allegations made by Pedro.

As to the case involving Sagun, Clemente denied any act of assessing fees for the case nor receiving any money for it.[39]

Clemente explained that it would be impossible for any assessment of docket fees to have been made in April 2019, as alleged by Pedro, because the records show that as early as March 25, 2019, the original complaint against Sagun had already been withdrawn by Pedro. Clemente explains that this withdrawal was granted on April 8, 2019.[40]

Clemente further denied that she received the PHP 50,000.00 that Pedro claimed she paid for the Sagun case, nor did she ask Pedro to sign a waiver. Clemente pointed out that there is no evidence to prove such document exists. Clemente also disavowed sending any text message or calling Sagun to arrange the meeting with Pedro, claiming that the issues between the parties in the Sagun case were settled through successful mediation.[41]

As to the case involving Pineda, however, Clemente alleged that it was Pedro who kept pestering her to help her collect Pineda's loan. According to Clemente, so as not to be rude, she agreed to help Pedro out. Clemente claimed that it was Pedro who knew Atty. Salibad. Clemente only advised Pedro to contact the lawyer and prepare the copies of the checks that will be used for the Batas Pambansa Blg. 22 cases.[42]

However, Clemente denied giving assurances to Pedro that she will be able to recover the money that Pineda owed her. Clemente also denied advising Pedro that a warrant of arrest may be issued, explaining that their clerk of court does not issue warrants of arrest in Batas Pambansa Blg. 22 cases.[43]

Clemente further claimed that it was Pedro who kept communicating with her to follow-up the status of the cases involving Pineda. Clemente alleged that it was during one phone conversation when she came to know that Pedro filed, through Atty. Salibad, two Batas Pambansa Blg. 22 cases and four small claims cases against Pineda. Clemente also learned that Atty. Salibad charged Pedro PHP 30,000.00 for the processing of the papers for filing the small claims cases in court.[44]

Insofar as the Batas Pambansa Blg. 22 cases are concerned, Clemente claimed that Pedro told her that she had no

idea how much she has to pay in court because Atty. Salibad did not give her an estimate. Clemente claimed that it was Pedro, who, in fact, told her that for the Batas Pambansa Blg. 22 cases, she was supposed to pay a package deal equivalent to 20% of the total considerations in the checks, amounting to PHP 280,000.00, representing attorney's fees, appearance fees, and other fees.[45]

Clemente claimed that Pedro vigorously pressed her to make an estimate so the latter could give it to Atty. Salibad. Allegedly having Pedro's best interest in mind, Clemente consulted the new clerk of court on the docket fees for the two Batas Pambansa Blg. 22 cases. At this juncture, Atty. Salibad arrived at the MCTC Roxas-Quirino Branch and asked Clemente if she knew Pedro whom he had assisted in subscribing the four small claim cases. When Clemente asked Atty. Salibad why he had not made an estimate himself, the lawyer answered that he was pressed for time and pleaded to Clemente to lend him a hand.[46]

Clemente claimed that the estimate she showed was based on the information from their clerk of court. After going over said estimate, Atty. Salibad said Pedro had to pay additional subscription fees for the verification of the small claims cases and the affidavits in the Batas Pambansa Blg. 22 cases which had already been filed in court. Clemente claimed that she was merely communicating said information from Atty. Salibad to Pedro.[47]

Regarding the alleged package deal for the Pineda cases, Clemente denied receiving from Pedro the partial amount of PHP 89,200.00 out of a total of PHP 199,200.00 for said deal. Clemente pointed out that Pedro failed to present any evidence to prove this.[48]

Conversely, Clemente claimed it was Atty. Salibad who issued a receipt in the amount of PHP 30,000.00 representing the acceptance fee. Clemente claimed Francisco Batin, Jr. (Batin), who is a close-in security of Atty. Salibad, was the one who delivered the receipt for the acceptance fee to Pedro at her residence. Clemente likewise denied that Pedro gave her an additional PHP 110,000.00 to complete the package deal fee. Clemente pointed out that she could not have possibly received the amount because she's not an employee of Atty. Salibad. Clemente stated that it was also Batin who delivered the receipt for the payment of PHP 100,000.00 to Pedro's residence.[49] As proof, Clemente attached Batin's affidavit, who corroborated her narration as to the payments made to Atty. Salibad, and who also stated that Atty. Salibad had been Pedro's lawyer for some time already.[50]

Clemente maintained that she does not know Atty. Salibad personally, and never talked to him about the specific cases filed against Pineda. It was Atty. Salibad who assisted Pedro in the paperwork regarding the Batas Pambansa Blg. 22 cases. Clemente also pointed out that Pedro cannot deny knowing Atty. Salibad because in a manifestation during a hearing on September 8, 2022, Pedro terminated his services.[51]

Regarding the four small claim cases against Pineda, Clemente insisted that she only came to know about these cases when she assisted their clerk of court in the processing of the cases for docketing purposes. Clemente claimed she had no role in the filing of the cases. Clemente further pointed out that the dismissal of the small claims cases was beyond her control as an employee.[52]

Nevertheless, Clemente admitted giving Pedro the amount of PHP 24,000.00 but clarified that she only did it to commiserate with Pedro on the sudden dismissal of the cases.[53]

Lastly, Clemente denied the authenticity of the tidbits of conversations and messages between her and Pedro, claiming they were cut and edited to put her in a bad light.[54]

Pedro also filed a Verified Reply with Motion for Resolution,[55] dated January 25, 2023. In her Reply (with motion to submit the case for resolution), dated January 25, 2023, Pedro reiterated her prior allegations.[56]

Pedro insisted that Clemente assured her that the warrant of arrest will be issued against Pineda. Clemente even

sent several text messages to Pineda to "hurry up" the filing of the Batas Pambansa Blg. 22 cases as their judge was about to retire. Trusting Clemente, Pedro gave the former PHP 200,000.00 as the latter promised to pay the fees due to the court.[57]

With respect to the receipts which according to Clemente were personally delivered by Batin, Jr. to Pedro, the latter claimed said receipts were spurious.[58]

Lastly, Pedro claimed Clemente's acts of meddling with the cases are beyond her duties as a court employee.[59]

Subsequently, Pedro filed a Second Motion for Resolution,[60] dated May 18, 2023.

In a Letter,[61] dated November 16, 2023, Clemente notified the JIB of her intent to optionally retire on January 1, 2024, and asked for the early resolution of her case.[62] Based on the records, Clemente's optional retirement was effective on February 29, 2024.[63] Finally, in a Letter,[64] dated May 6, 2025, Clemente informed the JIB that her application for retirement benefits was approved on May 13, 2024, and asked for the early resolution of the complaint against her.[65]

The Report and Recommendation of the Judicial Integrity Office (JIO)

In the Report and Recommendation,[66] dated October 28, 2025, JIO Officer-in-Charge Eduardo C. Tolentino recommended finding Clemente guilty of gross misconduct constituting violations of the CCCP. In light of Clemente's optional retirement, the JIO recommended the forfeiture of all or part of her benefits, except accrued leave credits, and perpetual disqualification from reinstatement or appointment to any public office as penalty.[67]

As to the allegations relating to the case involving Sagun, the JIO found insufficient evidence to support Pedro's claims. Pedro failed to provide any corroborative evidence to prove her accusations against Clemente. Notably, all the evidence submitted by Pedro were related to the cases involving Pineda, and not the one with Sagun. Therefore, the allegations as regards the Sagun case were not proven. Clemente was also able to show contradictory evidence that the timeline described by Pedro could be disproved, that as early as March 25, 2019, a Motion to Withdraw Complaint[68] had been filed by Pedro, which was subsequently approved in an Order,[69] dated April 8, 2019.[70]

On other hand, the JIO found the allegations against Clemente in the Pineda cases more plausible. To support her Complaint, Pedro attached screenshots of her numerous messages with Clemente where the latter could be seen providing advice on how Pedro would be able to collect from Pineda and general guidance on how to proceed with her cases. In fact, the JIO found that Clemente did not deny being involved in Pedro's legal transactions with her lawyer, Atty. Salibad, justifying it as an act of "kindness" to help Pedro out.[71]

As to the allegations that Clemente received payments from Pedro, the JIO did not find direct evidence that substantially proved the same. However, the JIO found the fact that Clemente agreed to pay Pedro PHP 24,000.00 proves that there is veracity to Pedro's complaint. Pedro excuses this payment as a sign of pity to commiserate with Clemente's loss in her case.[72]

Taking all the evidence together, the JIO concluded that it was proven that Clemente interfered in Pedro's cases against Pineda, and accepted remuneration beyond what she is entitled to in her official capacity, which are violations of Canon III, Section 2(b) and Canon I, Section 4, respectively, of the CCCP.[73]

The Issue

Is Clemente administratively liable?

The Ruling of the Court

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The recommendations of the JIO are well-taken, but the Court adopts a different designation of the charge.

Public office is a public trust. The Judiciary, as with every other government institution, is founded on public trust. Court officials and personnel, as the frontline actors in the administration of justice, are held to a higher standard of professional and ethical conduct. They are expected to embody independence, propriety, impartiality and equality, competence and diligence, and accountability in all aspects of their duties. Any act or omission that departs from these standards does not merely reflect on the court official or personnel involved, but imperils public trust in the Judiciary and undermines the rule of law.[74]

It bears to stress that the Court has, time and again, emphasized that court employees, from the presiding judge to the lowliest clerk, being public servants in an office dispensing justice, should always act with a high degree of professionalism and responsibility. Their conduct must not only be characterized by propriety and decorum but must also be in accordance with the law and court regulations. No position demands greater moral righteousness and uprightness from its holder than an office in the judiciary. Court employees should be models of uprightness, fairness and honesty to maintain the people's respect and faith in the judiciary. They should avoid any act or conduct that would diminish public trust and confidence in the courts. Indeed, those connected with dispensing justice bear a heavy burden of responsibility.[75]

Consequently, willful violations of the law by court employees will be dealt with by the full weight of the disciplinary powers of the Court.

In its investigation, the JIO found Clemente liable for gross misconduct for violating Canon I, Section 4, and Canon III, Section 2(b) of the CCCP. Under Administrative Matter No. 03-06-13-SC, the Court promulgated the CCCP on April 23, 2004 adopting norms of conduct that are specific to personnel in the Judiciary, citing the special nature of their duties and responsibilities. Nevertheless, all provisions of law and Civil Service rules governing or regulating the conduct of public officers and employees applicable to the Judiciary were also deemed incorporated into the CCCP.

On October 28, 2025 the Court, through Administrative Matter No. 25-06-11-SC, approved 2025 Code of Conduct and Accountability for Court Officials and Personnel (CCACOP). The CCACOP sets updated standards of professionalism and accountability for court workers, who must embody integrity in both their professional and personal lives as visible representations of the Judiciary. Notably, the CCACOP already integrates provisions on penalties and the disciplinary process.

Under the CCACOP's transitory clause, 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.

Finding no reason to the contrary, the Court shall decide this case by applying the CCACOP.

Clemente's actions violate Canons II and III of the CCACOP

In administrative proceedings, the quantum of proof necessary for a finding of guilt is substantial evidence or that amount of relevant evidence that a reasonable mind might accept as adequate to support a conclusion. The burden of substantiating the charges in an administrative proceeding falls on the complainant, who must be able to prove the allegations in the complaint with substantial evidence.[76]

In the hierarchy of evidentiary values, substantial evidence is the lowest standard of proof provided under the Rules of Court. In assessing whether there is substantial evidence in administrative investigations such as this case, the Court is not bound by technical rules of procedure and evidence.[77]

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In this case, the Court adopts the findings of the JIO that Pedro was unable to substantiate her allegations against Clemente regarding the Sagun case.

However, as to the cases involving Pineda, the evidence on record clearly proves that Clemente advocated on behalf of Pedro's case, intervened in Pedro's professional transactions with her counsel, and received monetary consideration for her assistance.

The Court lends little credence to Clemente's justification that she was only moved by kindness and pity when she went beyond the limits of her office to help Pedro, including: (1) constantly communicating with Pedro to reassure her and guide her with her case; (2) assisting Pedro with her counsel, Atty. Salibad, including in the processing of documents; and (3) paying back PHP 24,000.00 to Pedro in installments over a period of four months. The Court is not blind to such machinations perpetuated by corrupt employees to take advantage of court users.

Under Canon II of the CCACOP, court officials and personnel must not only be free from any impropriety, but must also be perceived to be so, with respect to their professional and personal conduct. The following sections are relevant to this case:

> SECTION 4. Prohibition against improper communications. - Except on official matters when allowed by the rules, court officials and personnel shall not communicate with lawyers, litigants, or their representatives, including on any social networking platform, on any pending matter before their office.
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> ....
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> SECTION 7. Prohibition against unwarranted special treatment. - Court officials and personnel shall treat everyone equally, unless required by law to be given a different standard of treatment.
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> ....
>
> SECTION 12. Prohibited acts involving the discharge of duties. When discharging their duties, court officials and personnel shall not:
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> ....
>
> (f) Directly or indirectly solicit or accept from court users, lawyers, litigants, or third parties dealing with the Judiciary, any gift, bequest, or favor, of any value on any occasion, except unsolicited gifts of small or insignificant value as a mere token of gratitude or friendship according to local customs and usage[.]

Meanwhile, Canon III on Impartiality and Equality of the CCACOP enjoins all court officials and personnel to always observe impartiality and equality to maintain confidence in the justice system. Under Canon III, the CCACOP provides the following:

> SECTION 4. Prohibition on recommending lawyers. - Court officials and personnel shall not recommend lawyers to litigants, prospective litigants, or anyone dealing with the Judiciary for personal interest or pecuniary gain.
>
> SECTION 5. Prohibition against comments on pending matters. - Except when duly authorized, court officials and personnel shall not make any public comment, nor initiate or engage in any communication, regarding a case or official matter pending before their office.
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> ....
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> SECTION 8. Nonacceptance of gifts and tips. - Court officials and personnel shall not receive gifts, tips, or other gratuities for assisting or attending to litigants, lawyers, or other court users.

Here, Clemente used the influence of her office to take advantage of the vulnerability and trust of Pedro. The totality of evidence shows, and supported no less than by her own admission, that Clemente repeatedly intervened on behalf of Pedro in relation to cases pending in court. That is a clear violation of the standard of conduct expected of court personnel. Clemente facilitated communications between Pedro and Atty. Salibad, inextricably linking herself to the fate of Pedro's cases.

Be that as it may, Pedro is not faultless. Yet, whatever Pedro's own faults and failure in judgment may be, the acts of Clemente must be judged in their own light.

Clemente's act of using her public office to communicate with a litigant, divulge information on pending actions in the court, facilitate transactions between a lawyer and a client, and receive monetary consideration for her intervention could only be described as gross misconduct tainted with corruption.

Clemente is liable for Bribery

Under Canon V, Sections 18 to 21 of the CCACOP, the Court outlined the classification of offenses under the Code and the list of acts that would constitute these offenses. The CCACOP considers bribery, direct and indirect, or violation of the Anti-Graft and Corrupt Practices Act as a serious offense.

Previously, the Court consistently applied the charge of grave misconduct for court personnel found to be involved in bribery.

In the 2014 case of Villahermosa v. Sarcia,[78] the Court strengthened its response to acts of bribery in the judiciary by clarifying that such constitute grave misconduct, which should, in turn, merit dismissal. The Court explained:

> In several cases, this court has held that the court personnel's act of soliciting or receiving money from litigants constitutes grave misconduct. The sole act of receiving money from litigants, whatever the reason may be, is antithesis to being a court employee.
>
> The Code of Conduct for Court Personnel requires that court personnel avoid conflicts of interest in performing official duties. It mandates that court personnel should not receive tips or other remunerations for assisting or attending to parties engaged in transactions or involved in actions or proceedings with the judiciary. "The Court has always stressed that all members of the judiciary should be free from any whiff of impropriety, not only with respect to their duties in the judicial branch but also to their behavior outside the court as private individuals, in order that the integrity and good name of the courts of justice shall be preserved." Court personnel cannot take advantage of the vulnerability of party-litigants.
>
> Grave misconduct merits dismissal. In some cases, the court exercised its discretion to assess mitigating circumstances such as length of service or the fact that a transgression might be the first offense of respondents. However, due to the gravity of the acts of respondents Sarcia and Rivamonte, no mitigating circumstances can be appreciated.
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> To the dismay of this court, it has received many complaints from party-litigants against court employees extorting money from them. This court has already heard various reasons given by court employees for receiving money from party-litigants. Thus, this court has held that money given voluntarily is not a defense. Alleged good intentions to help party-litigants are self-serving and will not absolve the misconduct committed by court employees.
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> There is no defense in receiving money from party-litigants. The act itself makes court employees guilty of grave misconduct. They must bear the penalty of dismissal.
>
> Indeed, "[a]s a court employee, [one] should be more circumspect in [one's] behavior and should [steer] clear

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of any situation casting the slightest of doubt on [one's] conduct." (Emphasis supplied, citations omitted)

Villahermosa was decided under the auspices of the old CCCP issued on May 15, 2004, whose provisions did not include specific language on bribery, and instead referred to provisions of Civil Service rules in a suppletory manner.

In 2022, the Court issued Administrative Matter No. 21-08-09-SC entitled Re: Further Amendments to Rule 140 of the Rules of Court, which was envisioned to institutionalize a complete, streamlined, and updated administrative disciplinary framework for the entire Judiciary that is wholly independent from the Civil Service rules, harmonized existing jurisprudence, and is uniformly applicable to all cases, regardless of when the infractions are committed.

Under Administrative Matter No. 21-08-09-SC, the Court outlined specific charges, including "Bribery, direct and indirect, and violations of the Anti-Graft and Corrupt Practices Act (Republic Act No. 3019)," under Serious Charges in Section 14(e).

However, in case law decided after the issuance of Administrative Matter No. 21-08-09-SC, the Court continued to consider acts of bribery as grave or gross misconduct.

In the 2023 case of Caparos v. Fajardo,[79] the Court found that the acts of the stenographer complained of, namely, asking and receiving to help fix and file a case, constituted gross misconduct.

Similarly, in the recent case of Gonzales v. Geronimo,[80] a court sheriff was charged with gross misconduct, bribery, serious dishonesty and violation of Supreme Court rules, directives and circulars. Citing Villahermosa, the Court found the accused sheriff guilty of grave misconduct meriting the penalty of dismissal.

Over the years, the Court has continued to treat findings of bribery of court personnel as appropriately covered under a grave or gross misconduct charge. Even in administrative cases involving judges, the same principle has been applied.

In Office of the Court Administrator (OCA) v. Judge Reyes,[81] the Court found the erring judge guilty of gross misconduct and ordered his dismissal after finding him liable for directly soliciting bribes from lawyers, litigants and even local elective officials.

At times, however, case law has also applied a different approach to findings of bribery applying other designations instead of gross or grave misconduct.

In Office of the Court Administrator v. Almanoche,[82] which involved the solicitation of money by a court stenographer from the mother of litigants in a criminal case, the Court found that the appropriate designation of the administrative offense was serious dishonesty, instead of gross misconduct given that the act complained of had no relation to the respondent's duties as a stenographer.

Meanwhile, in Tiwaken v. Milan,[83] the Court found the respondent clerk liable for various serious violations including demanding and receiving money from a litigant in violation of the relevant provisions of Republic Act No. 6713 or the Code of Conduct and Ethical Standards for Public Officials and Employees. The Court dismissed the respondent clerk for grave misconduct, dishonesty and conduct prejudicial to the best interests of the service.

Given the foregoing divergence in approach, there is need for a more consistent framework. The Court holds that, henceforth, the appropriate charge against court officials and personnel found to be liable for acts of bribery under the CCACOP shall be "bribery, direct and indirect, or violations of the Anti-Graft and Corrupt Practices Act" as listed under Serious Offenses in Canon V, Section 19(c) of the Code of the Conduct.

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In applying the charge of bribery, reference is made to Article 210 of the Revised Penal Code, which defines Direct Bribery, thus:

> ARTICLE 210. Direct Bribery. — Any public officer who shall agree to perform an act constituting a crime, in connection with the performance of his official duties, in consideration of any offer, promise, gift or present received by such officer, personally or through the mediation of another, shall suffer the penalty of prisión mayor in its medium and maximum periods and a fine not less than three times the value of the gift, in addition to the penalty corresponding to the crime agreed upon, if the same shall have been committed.
>
> If the gift was accepted by the officer in consideration of the execution of an act which does not constitute a crime, and the officer executed said act, he shall suffer the same penalty provided in the preceding paragraph; and if said act shall not have been accomplished, the officer shall suffer the penalties of prisión correccional in its medium period and a fine of not less than twice the value of such gift.
>
> If the object for which the gift was received or promised was to make the public officer refrain from doing something which it was his official duty to do, he shall suffer the penalties of prisión correccional in its maximum period to prisión mayor in its minimum period and a fine not less than three times the value of the gift.
>
> In addition to the penalties provided in the preceding paragraphs, the culprit shall suffer the penalty of special temporary disqualification.
>
> The provisions contained in the preceding paragraphs shall be made applicable to assessors, arbitrators, appraisal and claim commissioners, experts or any other persons performing public duties.

In criminal proceedings, jurisprudence teaches that to sustain a conviction for direct bribery, the following essential elements must be established: (a) the offender is a public officer; (b) the offender accepts an offer or promise or receives a gift or present by himself or through another; (c) such offer or promise be accepted or gift or present be received by the public officer with a view to committing some crime, or in consideration of the execution of an act which does not constitute a crime but the act must be unjust, or to refrain from doing something which it is his official duty to do; and (d) the act which the offender agrees to perform or which he executes is connected with the performance of his official duties.[84]

Nevertheless, well-settled is the principle that while criminal and administrative proceedings may involve similar operative facts, each requires a different quantum of evidence. As discussed, administrative cases require only substantial evidence, or such relevant evidence as a reasonable mind might accept as adequate to support a conclusion,[85] This is because the purpose of administrative proceedings is mainly to protect the public service, based on the time-honored principle that a public office is a public trust. On the other hand, the purpose of the criminal prosecution is the punishment of crime.[86]

Weighing the evidence in this case against the jurisprudential standard, it is clear that Clemente, being a public officer, solicited and received money to intervene on Pedro's behalf in her cases pending before the court. Such intervention is prohibited by the canons of conduct applicable to her and an abuse of her public office. The sound conclusion is that Clemente is administratively liable for bribery.

Nevertheless, this administrative finding of guilt for bribery is without prejudice to the filing of a separate criminal action against Clemente. Jurisprudence establishes that a single act may offend against two or more distinct and related provisions of law, or that the same act may give rise to criminal as well as administrative liability. As such, they may be prosecuted simultaneously or one after another, so long as they do not place the accused in double jeopardy of being punished for the same offense.[87]

As to the proper penalty, the Court adopts the same paradigm as in previous cases involving bribery, although

charged as grave or gross misconduct, to merit dismissal.

In Dela Cruz v. Malunao,[88] the Court adjudged that Malunao, a Clerk, had used her position to solicit money from a party with the promise of a favorable decision. The Court found Malunao guilty of grave misconduct and dismissed her from the service. Notably, in the case of Malunao, she was also facing a few other administrative complaints over the same accusations of extortion and solicitation, and was already under preventive suspension.

In this case, the records do not show that Clemente is facing other complaints or has been previously administratively sanctioned for similar or other causes. However, the actions of Clemente involved the solicitation of monetary consideration to intervene in cases of a court user, which reeks of the culture of corruption that the Court has historically battled and struggled to efface.

The Court cannot countenance any corrupt practice, whether small or big in scale. Any such action violates the people's trust. Even in simple, almost unnoticeable practices, court officials and personnel must reject taking advantage of the privilege of their office to prey on vulnerable court users. Public trust is simply the lifeblood of the Judiciary, and if it withers so will the rule of law.

Ultimately, safeguarding judicial integrity and broadening access to justice are intertwined endeavors. Success in one reinforces success in the other: a clean and upright Judiciary inspires public trust, which in turn encourages people to rely on the courts to resolve their disputes, rather than resort to extralegal means. As more citizens come to see the courts as a viable forum for justice, there will be greater public demand for fair and efficient adjudication, creating a positive feedback loop that further incentivizes reforms.[89]

In this way, the Court truly serves as the bridge to justice: each corrupt official removed, each innovation that eases a poor litigant's journey through the courts, each transparency measure adopted, are the planks of a bridge toward a stronger rule of law.[90]

The Court must, thus, take a tough stance on corruption within its own halls, dealing with it severely – if only to preserve the already fragile trust of the Filipino people in their institutions.

In terms of appropriate penalty, under Section 22(1) of the CCACOP, if the respondent is found guilty of a serious offense, any of the following penalties shall be imposed:

> (a) Dismissal from the service, forfeiture of all or part of the benefits as the Supreme Court may determine, and disqualification from reinstatement or appointment to any public office, including in government-owned or -controlled corporations. Provided, however, that the forfeiture of benefits shall in no case include accrued leave credits;
>
> (b) Suspension from office without salary and other benefits for one year and one day up to two years; and/or
>
> (c) A fine of more than PHP 101,000.00 but not more than PHP 500,000.00.

Meanwhile, Section 23 of the same Code provides that in case the respondent is found liable for an offense which merits the imposition of the penalty of dismissal from service but the same can no longer be imposed due to the respondent's prior resignation, retirement, or other mode of separation from the service except for death, the respondent may be meted with the following penalties in lieu of dismissal:

> (a)
>
> Forfeiture of all or part of the benefits as the Supreme Court may determine, and disqualification from reinstatement or appointment to any public office, including in government-owned or -controlled corporations. Provided, however, that the forfeiture of benefits shall in no case include accrued leave credits; and/or

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(b)

Fine, as applicable under this Canon.

Considering all the circumstances in this case, the Court adopts the recommended penalty of the JIO and imposes the penalty of forfeiture of retirement benefits, except accrued leave credits, if any, and disqualification from reinstatement or appointment to any public office, including in government-owned or -controlled corporations.

Final Note

In the last few years, the Court has undertaken dedicated integrity reforms to ensure that no one in the Judiciary acts above the law and that ethical breaches are faced with real consequences. These include both strengthening the three Codes of Conduct, which includes the CCACOP, and overhauling enforcement mechanisms to make accountability not only swift, but, more importantly, certain.[91]

The clear message is that articulating integrity will never be enough. The Judiciary must systematically and consistently require it. By demonstrating that judges and court personnel cannot evade discipline for misconduct, the Court seeks to rebuild public confidence in the notion that justice within the courts is being done and the judicial arbiters are trustworthy.[92]

Conversely, failing to bridge the accountability gap will have serious consequences. It will embolden those willing to abuse their position, knowing that sanctions are unlikely or would come too late, with retirement seen as a convenient pathway out. It will also send a demoralizing signal to the rest of the bench and bar who conscientiously adhere to ethical standards, as they witness corrupt colleagues go unpunished and sometimes not just prosper, but get promoted. The end result is a crisis of confidence, a public left struggling to believe in the justice system's integrity.

In strictly enforcing the accountability measures under the Codes of Conduct, the Court will see to it that confidence of the public is fostered and reinvigorated.

FOR THESE REASONS, the Court FINDS respondent Lorna M. Clemente, Court Stenographer I, Municipal Circuit Trial Court, Roxas-Quirino, Isabela, GUILTY of bribery and imposes on her, in lieu of dismissal, the penalty of FORFEITURE of all retirement benefits, except accrued leave credits, if any, and perpetual disqualification from reinstatement or appointment to any public office, including government-owned and/or -controlled corporations. This finding of administrative liability is without prejudice to the filing of a separate criminal action against Lorna M. Clemente, if warranted.

SO ORDERED.

Gesmundo, C.J., Leonen, SAJ., Caguioa, Inting, Zalameda, Gaerlan, Rosario, Dimaampao, Marquez, and Kho, Jr., JJ., concur.
Hernando,[*] J., on leave.
Lazaro-Javier[*][*] and Lopez,[*][*] JJ., on official business.
Villanueva,[*][*][*] J., no part.

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[*] On leave.

[*][*] On official business.

[*][*][*] No part.

[1] Rollo, p. 238.

[2] Id. at 4.

[*][*][*][*] Now a member of this Court.

[3] Id. at 5-12.

[4] Id. at 4.

[5] Id. at 5.

[6] Id. at 238.

[7] Id. at 5.

[8] Id. at 239.

[9] Id.

[10] Id.

[11] Id. at 6.

[12] Id. at 239.

[13] Id.

[14] Id.

[15] Id.

[16] Id. at 240.

[17] Id. at 7.

[18] Id. at 240.

[19] Id.

[20] Id. at 7.

[21] Id. at 240.

[22] Id.

[23] Id. at 8.

[24] Id. at 240-241.

[25] Id. at 8.

[26] Id.

[27] Id.

[28] Id.

[29] Id. at 23.

[30] Id. at 24.

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[31] Id. at 9.

[32] Id. at 9.

[33] Id. at 241.

[34] Id. at 10.

[35] Id. at 39.

[36] Id.

[37] Id. at 42-53.

[38] Id. at 241.

[39] Id.

[40] Id.

[41] Id.

[42] Id. at 242.

[43] Id.

[44] Id.

[45] Id.

[46] Id.

[47] Id.

[48] Id. at 243.

[49] Id.

[50] Id. at 93-94.

[51] Id. at 243.

[52] Id.

[53] Id.

[54] Id.

[55] Id. at 184-188.

[56] Id. at 243.

[57] Id. at 243-244.

[58] Id. at 244.

[59] Id.

[60] Id. at 216.

[61] Id. at 233.

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[62] Id. at 233-234.

[63] Id. at 249.

[64] Id. at 237.

[65] Id.

[66] Id. at 238-250.

[67] Id. at 250.

[68] Id. at 67.

[69] Id. at 68.

[70] Id. at 247.

[71] Id. at 247-249.

[72] Id.

[73] Id. at 249.

[74] A.M. No. 25-06-11-SC, Re: The 2025 Code of Conduct and Accountability for Court Officials and Personnel, October 28, 2025 [Per J. Singh, En Banc].

[75] Office of Court Administrator v. Delicana, 953 Phil. 1, 19 (2024) [Per J. Hernando, En Banc].

[76] Galit-Inoy v. Inoy, 926 Phil. 185, 188 (2022) [Per J. Inting, Third Division].

[77] Dela Cruz v. Malunao, 684 Phil. 493, 502-503 (2018) [Per Curiam, En Banc].

[78] Villahermosa v. Sarcia, 726 Phil. 408 (2014) [Per Curiam, En Banc].

[79] Caparos v. Fajardo, 947 Phil. 34 (2023) [Per Curiam, En Banc].

[80] Gonzales v. Geronimo, A.M. No. P-25-244 (July 8, 2025) [Per Curiam, En Banc].

[81] OCA v. Judge Reyes, 948 Phil. 100 (2023) [Per Curiam, En Banc].

[82] OCA v. Almanoche, 950 Phil. 559 (2024) [Per J. J.Y. Lopez, En Banc].

[83] Tiwaken v. Milan, A.M. No. P-21-028 (July 8, 2025) [Per Curiam, En Banc].

[84] Purugganan v. People, 936 Phil. 997, 1009 (2023) [Per J. Inting, Third Division].

[85] Paredes v. Court of Appeals, 555 Phil. 538, 549-550 (2007) [Per J. Chico-Nazario, Third Division].

[86] Ferrer v. Sandiganbayan, 572 Phil. 244, 254 (2008) [Per J. Austria-Martinez, Third Division].

[87] Montero v. Office of the Ombudsman, 926 Phil. 695, 708 (2022) [Per J. Leonen, Second Division].

[88] Dela Cruz v. Malunao, 684 Phil. 493 (2012) [Per Curiam, En Banc].

[89] J. Singh, Associate Justice, Supreme Court of the Philippines, The Supreme Court's Role in Combating Corruption and Bridging Access to Justice: Saying What Needs to be Said, Doing What Needs to be Done, delivered at University of the Philippines Law Complex – Institute for the Administration of Justice, January 26, 2026.

[90] Id.

[91] J. Singh, Associate Justice, Supreme Court of the Philippines, The Supreme Court's Role in Combating Corruption and Bridging Access to Justice: Saying What Needs to be Said, Doing What Needs to be Done, delivered at University of the Philippines Law Complex – Institute for the Administration of Justice, January 26, 2026.

[92] Id.

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