COMMISSION ON ELECTIONS, REPRESENTED BY ATTY. SABINO C. MEJARITO, THE CAMPAIGN FINANCE OFFICE, COMPLAINANT, VS. ATTY. PAISAL A. PADATE, RESPONDENT.

A.C. No. 11037, August 26, 2026

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PER CURIAM:

Before the Court is a verified Complaint-Affidavit[1] for disbarment filed by the Commission on Elections (COMELEC) through the Campaign Finance Office (CFO), represented by Atty. Sabino C. Mejarito, acting head, against Atty. Paisal A. Padate (Atty. Padate), for alleged violations of the Code of Professional Responsibility and the 2004 Rules on Notarial Practice.

Factual Antecedents

The COMELEC alleged that Amer-Ali B. Mangandog (Mangandog) filed a certificate of candidacy for the position of municipal councilor in the May 10, 2010 National and Local Elections. Pursuant to election laws, Mangandog was required to file a Statement of Contributions and Expenditures (SOCE) within 30 days from election day.[2]

However, COMELEC records purportedly showed that Mangandog failed to comply with this requirement. Consequently, on August 7, 2014, the Campaign Finance Unit, now the CFO, issued a notice to explain directing Mangandog to account for his failure to file the required SOCE within the prescribed period.[3]

In response, Mangandog submitted a sworn letter dated October 27, 2014, wherein he claimed that he had seasonably filed his SOCE and had duly complied with all legal requirements attendant thereto.[4] The letter was subscribed and sworn to before Atty. Padate.[5]

To substantiate his assertion of compliance, Mangandog appended to his letter copies of his SOCE,[6] Schedule of Expenditures,[7] and Summary Report of Expenditures[8] purportedly covering his campaign activities in the May 10, 2010 elections. The attached documents, however, bore notarizations executed 'by Atty. Padate on different dates.[9] The jurats of the SOCE and the Schedule of Expenditures indicated that they were notarized on June 6, 2010, while the Summary Report of Expenditures bore a jurat dated June 1, 2014.[10]

Upon verification, however, the COMELEC discovered that the SOCE and Schedule of Expenditures submitted by Mangandog were prepared using forms that were released and made available only in 2013. Consequently, it would have been impossible for Atty. Padate to have notarized the same on June 6, 2010, as indicated in their respective jurats. For the COMELEC, this circumstance strongly suggested that the notarization dates appearing on the documents had been deliberately antedated. It argued that Atty. Padate deliberately caused it to appear that the documents had been executed and notarized in 2010 to support Mangandog's assertion that he had timely complied with the requirement of filing the SOCE. By affixing his notarial seal and signature on the documents, Atty. Padate allegedly conferred upon them the presumption of regularity and authenticity accorded to notarized instruments, notwithstanding the purported falsity of the dates appearing therein.[11]

The COMELEC further asserted that Atty. Padate's participation did not end with the notarization of the allegedly antedated documents. He likewise notarized Mangandog's sworn letter-explanation dated November 20, 2014, wherein the latter invoked the same documents as proof of his alleged prior compliance with election laws.[12]

Thus, the COMELEC charged Atty. Padate with violating the duties and responsibilities imposed upon him as a notary public and as a member of the Bar. By allegedly antedating the notarization of documents and authenticating a sworn explanation founded thereon, Atty. Padate allegedly undermined the integrity of the notarization process and diminished public confidence in notarized instruments.[13]

For his part, Atty. Padate denied the accusations against him and maintained that he had no participation in the alleged falsification or antedating of the subject documents.[14]

Atty. Padate averred that as a former provincial election supervisor, he is equipped with extensive knowledge of election laws, procedures, and documentary requirements. Given such experience, it would have been inconceivable for him to knowingly notarize documents that were patently defective or falsified. It was implausible that he would risk his privilege to practice the legal profession and expose himself to administrative, civil, and criminal liability in exchange for a minimal notarial fee. He stressed that he had spent years building his professional reputation and standing in the community and that he would not compromise the same for a negligible amount.[15]

Atty. Padate further expressed dismay at what he perceived to be an unwarranted attack on his integrity and character. He emphasized that he comes from a respected and distinguished family in Lanao del Sur, his father having served as Sultan of the Sultanate of Tubok. The allegations were not only baseless but were likewise injurious to the honor and reputation that he and his family had cultivated over the years. He also intimated that his religious affiliation as a Muslim' may have played a role in the accusations lodged against him and suggested that he was being unfairly singled out and discriminated against.[16]

More significantly, Atty. Padate categorically denied having notarized Mangandog's sworn letter-explanation dated November 20, 2014, or any of the documents attached thereto. He maintained that he neither witnessed the execution of the questioned documents nor administered any oath in connection therewith. Consequently, he denied having affixed his signature, seal, or notarial details on the instruments submitted by Mangandog to the COMELEC.[17]

To explain his purported signature and notarial markings on the questioned documents, Atty. Padate posited that unknown individuals may have unlawfully reproduced or duplicated his notarial seal, forged his signature, and utilized his notarial credentials without his knowledge or consent. He claimed that the possibility of such unauthorized acts could not be discounted, particularly because the documents surfaced years after the dates they allegedly bore and were presented in proceedings in which he had no personal involvement.[18]

Atty. Padate thus insisted that the notarizations attributed to him were spurious and could not serve as basis for administrative liability. Absent competent proof establishing that he personally. notarized the subject documents, the allegations against him rested on mere speculation and conjecture. For this reason, he urged that the complaint be dismissed for failure to establish his participation in the alleged misconduct.[19]

Report and Recommendation of the investigating commissioner

The Report and Recommendation[20] of the investigating commissioner of the Commission on Bar Discipline of

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the Integrated Bar of the Philippines (IBP) dated March 22, 2023 recommended the suspension of Atty. Padate from the practice of law for a period of two years and the immediate revocation of his notarial commission and disqualification from being reappointed as a notary public for a period of two years. The dispositive portion reads:

> WHEREFORE, premises considered, the Commission respectfully RECOMMENDS that the Board of Governors find Atty. Paisal A. Padate GUILTY of violating the 2004 Rules on Notarial Practice and Rule 1.01 of Canon 1 of the Code of Professional Responsibility. The Commission further RECOMMENDS that Atty. Padate be penalized with SUSPENSION OF TWO (2) YEARS from the practice of law, IMMEDIATE REVOCATION of his notarial commission, if presently commissioned, and DISQUALIFICATION from being reappointed as a notary public for a period of two (2) years.
>
> RESPECTFULLY RECOMMENDED.[21] (Emphasis in the original)

The investigating commissioner opined that Atty. Padate should be held administratively liable for failure to comply with the mandatory requirements of the 2004 Rules on Notarial Practice.[22]

Report and Recommendation of the Board of Governors (BOG) of the IBP

The IBP-BOG modified the penalties recommended by the investigating commissioner in its Resolution.[23] dated June 2, 2023, by recommending the immediate revocation of Atty. Padate's notarial commission, disqualification form being commissioned as a notary public for a period of two years, and suspension from the practice of law for one year.[24] The dispositive portion of the Resolution reads:

> RESOLVED, to [MODIFY], as it is hereby MODIFIED, the Report and Recommendation of the Investigating Commissioner (IC), to mete out upon respondent Atty. Paisal A. Padate the following penalties: – i) IMMEDDIATE REVOCATION of his Notarial Commission, if subsisting, ii) DISQUALIFICATION from being commissioned as a Notary Public for TWO (2) YEARS, and iii) SUSPENSION from the practice of law for one (1) year; and
>
> RESOLVED FURTHER, to recommend that the respondent be meted out with the additional penalty of FINE of [PHP] 5,000.00 for his failure to file the position paper as required by the IC.[25] (Emphasis in the original)

Issue

The issue for resolution is whether there is substantial evidence to hold respondent administratively liable.

Our Ruling

Upon a judicious and thorough review of the records and the evidence on hand, the Court adopts the findings of the IBP but with modification as regards the recommended penalty.

In administrative cases, the complainant bears the onus of proving the averments of the complaint by substantial evidence.[26] Only substantial evidence is required to warrant disciplinary sanctions in administrative proceedings.[27] Substantial evidence is defined as that amount of relevant evidence which a reasonable mind might accept as adequate to justify a conclusion.[28] The standard of substantial evidence is satisfied when there is a reasonable ground to believe that a person is responsible for the misconduct complained of, even if such evidence might not be overwhelming or even preponderant.[29]

The COMELEC's evidence in support of its complaint against respondent consists of the very documents purportedly notarized by him, all of which bore his signature and reflected the particulars of his commission as a notary public. In his defense, respondent merely denies having notarized these documents and claims that they are

products of forgery. As correctly held by the IBP, the burden of proving forgery rests upon the party who alleges it. In this case, respondent failed to discharge such burden. His uncorroborated assertions do not overcome the evidentiary weight of the documents bearing his commission details and signature as notary public.

Thus, the Court finds that the existence and presentation of these notarized documents constitute substantial evidence sufficient to support the conclusion that respondent, in fact, notarized the same.

Anent the issue of whether the subject documents were antedated, the records disclose that Mangandog's SOCE and Schedule of Expenditures were accomplished only after the issuance and availability of the 2013 official forms, notwithstanding that they were made to appear as having been executed in 2010. Such antedating constitutes a deliberate misrepresentation of the time of execution of the said documents. This act is patently inconsistent with, and in direct contravention of, the 2004 Rules on Notarial Practice.[30]

Rule IV, Section 5 of the 2004 Rules on Notarial Practice states:

> SEC. 5. False or Incomplete Certificate. – A notary public shall not:
>
> (a) execute a certificate containing information known or believed by the notary to be false.
>
> (b) affix an official signature or seal on a notarial certificate that is incomplete.[31]

Clearly, such conduct is inimical to the very purpose of notarization and diminishes the public confidence reposed in notarized documents, which are ordinarily accorded full faith and credit in legal and administrative proceedings. Accordingly, the Court finds that the act of antedating, as established by the records, constitutes a serious breach of the duties of a notary public and a violation of the trust reposed upon him by law and by the public.

To stress, the act of notarization is impressed with public interest.[32] It converts a private document into a public document, making it admissible in evidence without further proof of its authenticity.[33] A notarial document is, by law, entitled to full faith and credence.[34] As such, a notary public must observe with utmost care the basic requirements in the performance of their duties to preserve the confidence of the public in the integrity of the notarial system.[35] Notaries must, therefore, inform themselves of the facts they certify to; more importantly, they should not take part or allow themselves to be part of illegal transactions.[36]

In addition to the antedating of the SOCE and Schedule of Expenditures, the IBP-IC correctly observed several other material irregularities attending the notarization of Mangandog's submissions to the COMELEC. Notably, the notarial certificates appended thereto do not reflect any competent evidence of identity. This omission is not a mere technical defect but a substantive lapse that goes into the very validity of the notarial act, as the presentation of competent proof of identity is indispensable to the proper exercise of a notary public's function.

Moreover, the docket numbers assigned to the subject documents appear irregular and inconsistent. In particular, the SOCE and the Summary Report of Expenditures bear identical docket numbers notwithstanding that they were purportedly executed and notarized four years apart, in violation of the sequential and chronological recording requirements under Rule VI of the Rules on Notarial Practice. Such inconsistency raises serious doubts as to the integrity of the notarial register and the regularity of the entries therein.

Further, the Schedule of Expenditures and the Summary Report of Expenditures reflect different dates of execution and notarization, thereby indicating that the documents may have been subscribed prior to their presentation before respondent for notarization. This circumstance runs counter to Rule II, Section 6, in relation to Rule VI, Section 2(a) of the Rules on Notarial Practice, which requires that the act of jurat be performed only at the time the document is actually presented before the notary public and subscribed in his presence.

Taken together, these circumstances demonstrate a marked indifference on the part of respondent to the mandatory requirements governing notarial practice. His actuations are precisely the kind of irregularities that the Rules on Notarial Practice were designed to prevent, as they undermine the integrity, authenticity, and reliability of notarized instruments.

As a notary public, respondent is duty-bound to ensure strict compliance with the formal and substantive requisites of notarization, so that documents acknowledged before him may be accorded full faith and credit in legal and administrative proceedings. His failure to do so erodes the public's confidence in the notarial system and defeats the very purpose for which notarization is required by law.

In this light, the Court cannot treat respondent's omissions as mere technical defects. The nature and extent of the violations demonstrate a failure to observe the standards of conduct required of members of the Bar who are commissioned as notaries public. Such conduct warrants the imposition of administrative sanction not only to discipline the erring lawyer but, more importantly, to uphold the integrity of the notarial system and deter similar misconduct.

Thus, the Court finds the recommendation of the IBP to be well-taken and consistent with prevailing rules and jurisprudence and thus holds respondent administratively liable.

While the instant disbarment Complaint was filed before the effectivity of the Code of Professional Responsibility and Accountability (CPRA), the code still applies to all pending cases.[37]

Verily, for knowingly participating in the assertion of falsehood when he notarized the subject documents, respondent violated the 2004 Rules on Notarial Practice, as well as Canon II, Section 1 of the CPRA, viz.:

> CANON II
> Propriety
> A lawyer shall, at all times, act with propriety and maintain the appearance of propriety in personal and professional dealings, observe honesty, respect and courtesy, and uphold the dignity of the legal profession consistent with the highest standards of ethical behavior.
>
> SECTION 1. Proper Conduct. — A lawyer shall not engage in unlawful, dishonest, immoral, or deceitful conduct[.]

In the present case, the mere act of antedating the subject documents renders respondent administratively liable for violating Canon II, Section 1 of the CPRA, which mandates that a lawyer shall always uphold the integrity and dignity of the legal profession.

Worse, the record further shows that respondent likewise notarized Mangandog's letter-explanation, wherein the latter falsely represented compliance with the rules on election campaign expenditures and relied upon the very antedated documents earlier notarized by respondent as supporting evidence.

These actuations, taken together, reflect a disturbing indifference to the stringent standards imposed upon members of the Bar, particularly those commissioned as notaries public.

As for the corresponding sanctions, Canon VI, Section 33(p) of the CPRA provides that the violation of notarial rules is considered as a serious offense. Section 37(a) thereof provides that any of the following sanctions, or a combination thereof, may be imposed on a respondent found guilty of a serious offense: (1) disbarment; (2) suspension from the practice of law for a period exceeding six months; (3) revocation of notarial commission and disqualification as notary public for not less than two years; or (4) a fine exceeding PHP100,000.00.

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Nevertheless, the penalty to be imposed upon respondent must be determined in accordance with the modifying circumstance obtaining in this case.

Canon VI, Section 38 of the CPRA vests the Court with the discretion to appreciate the presence of mitigating and aggravating circumstances in fixing the appropriate administrative sanction. Among the recognize mitigating circumstances is the fact that the administrative case constitutes the respondent's first offense.[38] Conversely, the respondent's unjustified failure to comply with the lawful orders or directives of the Court or the IBP is considered an aggravating circumstance pursuant to Canon VI, Section 38(b)(7) of the CPRA.[39] While Canon VI, Section 34(c) of the CPRA classifies the willful and deliberate disobedience of lawful orders of the Court and the IBP as a less serious offense, Canon VI, Section 38(b) expressly accords the Court discretion to consider the respondent's failure to comply with such orders during an administrative proceeding as an aggravating circumstance. Thus, notwithstanding the classification of the underlying violation as a less serious offense, the respondent's noncompliance with the orders of the Court and the IBP may be considered as an aggravating circumstance in determining the appropriate penalty to be imposed against the respondent lawyer. Correlatively, Canon VI, Section 39 of the CPRA prescribes the manner by which such modifying circumstances shall affect the imposable penalty, thus:

> SECTION 39. Manner of imposition. — If one (1) or more aggravating circumstances and no mitigating circumstances are present, the Supreme Court may impose the penalties of suspension or fine for a period or amount not exceeding double of the maximum prescribed under this Rule. The Supreme Court may, in its discretion, impose the penalty of disbarment depending on the number and gravity of the aggravating circumstances.
>
> If one (1) or more mitigating circumstances and no aggravating circumstances are present, the Supreme Court may impose the penalties of suspension or fine for a period or amount not less than half of the minimum prescribed under the CPRA.
>
> If there are both aggravating and mitigating circumstances present, the Supreme Court may offset each other. (Emphasis supplied)[40]

The records show that respondent failed to file the required position paper despite due notice and the directive of the IBP. Respondent likewise offered no explanation for such omission. His unjustified noncompliance with the IBP's directive reflects a disregard of the disciplinary processes governing members of the Bar and, under Canon VI, Section 38(6)(7) of the CPRA, constitutes an aggravating circumstance.[41] The Court likewise observes that the instant administrative case is respondent's first offense. This circumstance may be appreciated in his favor pursuant to Canon VI, Section 38(a)(1) of the CPRA. Considering that both an aggravating and a mitigating circumstance are attendant, the Court finds it proper to apply the third paragraph of Canon VI, Section 39 of the CPRA, which authorizes the offsetting of such circumstances.[42] Thus, respondent's unjustified noncompliance with the directive of the IBP is offset by the mitigating circumstance of his having no prior administrative liability.

With the aggravating and mitigating circumstances thus offsetting one another, the Court finds no basis to either increase or reduce the penalty otherwise imposable under the CPRA. Accordingly, the proper penalty shall be imposed in accordance with the prescribed sanction for the offense committed.

In addition, it must be noted that respondent failed to file the position paper required by the Investigating Commissioner. Under the CPRA, disobedience of the lawful orders of the IBP are treated as a less serious offense.[43] Canon VI, Section 34(c) classifies willful and deliberate disobedience of the orders of the Court and the IBP as a less serious offense and penalizes the same with any or a combination of the following sanctions: (1) Suspension from the practice of law for a period within the range of one (1) month to six (6) months, or

revocation of notarial commission and disqualification as notary public for less than two (2) years; (2) A fine within the range of PHP 35,000.00 to PHP 100,000.00.[44]

Nevertheless, the Court finds that the penalty to be imposed upon respondent must be determined in accordance with the modifying circumstance obtaining in this case.

Canon VI, Section 38 of the CPRA vests the Court with the discretion to appreciate the presence of mitigating and aggravating circumstances in fixing the appropriate administrative sanction. Among the mitigating circumstances expressly recognized therein is the fact that the administrative case constitutes the respondent's first offense.[45] Conversely, the respondent's unjustified failure to comply with the lawful orders or directives of the Court or the IBP is considered an aggravating circumstance.[46] Correlatively, Canon VI, Section 39 of the CPRA prescribes the manner by which such modifying circumstances shall affect the imposable penalty, thus:

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>
> If one (1) or more mitigating circumstances and no aggravating circumstances are present, the Supreme Court may impose the penalties of suspension or fine for a period or amount not less than half of the minimum prescribed under the CPRA.
>
> If there are both aggravating and mitigating circumstances present, the Supreme Court may offset each other. (Emphasis supplied)[47]

The records show that respondent failed to file the required position paper despite due notice and the directive of the IBP. Respondent likewise offered no explanation for such omission. His unjustified noncompliance with the IBP's directive reflects a disregard of the disciplinary processes governing members of the Bar and, under Canon VI, Section 38(b)(7) of the CPRA, constitutes an aggravating circumstance.[48] The Court likewise observes that the instant administrative case is respondent's first offense. This circumstance may be appreciated in his favor pursuant to Canon VI, Section 38(a)(1) of the CPRA. Considering that both an aggravating and a mitigating circumstance are attendant, the Court finds it proper to apply the third paragraph of Canon VI, Section 39 of the CPRA, which authorizes the offsetting of such circumstances.[49] Thus, respondent's unjustified noncompliance with the directive of the IBP is offset by the mitigating circumstance of his having no prior administrative liability.

With the aggravating and mitigating circumstances thus offsetting one another, the Court finds no basis to either increase or reduce the penalty otherwise imposable under the CPRA. Accordingly, the proper penalty shall be imposed in accordance with the prescribed sanction for the offense committed. Thus, the Court deems it appropriate to mete on respondent the penalties of suspension from the practice of law for a period of one year; immediate revocation of his notarial commission, if still existing; and disqualification as a notary public for a period of two years.[50]

All told, it is difficult to believe that respondent had no knowledge of the falsity of the assertions contained in the subject documents, considering that he himself prepared, issued, or otherwise caused the issuance of the questioned documents reflecting the challenged dates and entries. The surrounding circumstances, therefore, negate any claim of good faith and render his denial of participation implausible and unworthy of credence.

While it is a settled rule that a notary public is not a guarantor of the truth of the contents of the instrument acknowledged before him, this limitation presupposes the regular and faithful performance of notarial duties. It

does not extend protection to a notary who himself participates in, facilitates, or enables the use of falsified documents as such conduct constitutes a violation of the standards of honesty, integrity, and propriety required under the CPRA and cannot be countenanced by the Court.

ACCORDINGLY, Atty. Paisal A. Padate is declared GUILTY of violating Canon VI, Section 33(p) of the Code of Professional Responsibility and Accountability. He is SUSPENDED from the practice of law for ONE YEAR. He is also meted the penalty of REVOCATION of his notarial commission, if existing, and DISQUALIFICATION as notary public for a period of TWO YEARS. He is STERNLY WARNED that future infractions shall be dealt with more severely.

Atty. Paisal A. Padate is DIRECTED to immediately file a Manifestation indicating his date of receipt of this Decision to determine the reckoning point of his suspension.

Let a copy of this Decision be furnished to the Office of the Bar Confidant, to be appended to Atty. Paisal A. Padate's personal records as attorney. Likewise, let copies of this Decision be furnished to the Integrated Bar of the Philippines and the Office of the Court Administrator for dissemination to all courts in the country.

SO ORDERED.

Gesmundo, C.J., Leonen, SAJ., Caguioa, Hernando, Lazaro-Javier, Inting, Zalameda, Gaerlan, Rosario, Lopez, Dimaampao, Marquez, Kho, Jr., Singh, and Villanueva, JJ., concur.

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[1] Rollo, pp. 1-6.

[2] Id. at 2.

[3] Id. at 3.

[4] Id. at 10.

[5] Id.

[6] Id. at 11.

[7] Id. at 12.

[8] Id. at 13.

[9] Id. at 11-13.

[10] Id.

[11] Id. at 157.

[12] Id.

[13] Id. at 156-157.

[14] Id. at 64-68.

[15] Id. at 144-145.

[16] Id.

[17] Id.

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[18] Id.

[19] Id.

[20] Id. at 156-167. The March 22, 2023 Report and Recommendation in CBD Case No. 19-6170 was issued by Commissioner Eleber B. Jacla of the Integrated Bar of the Philippines Commission on Bar Discipline, Pasig City.

[21] Id. at 167.

[22] Id.

[23] Id. at 154-155. The June 2, 2023 Notice of Resolution in CBD Case No. 19-6170 was issued by Doroteo Lorenzo B. Aguila, National Secretary of the Integrated Bar of the Philippines Board of Governors, Pasig City.

[24] Id.

[25] Id.

[26] Bayona v. Basa-Diviva, OCA-IPI No.20-3112-MTJ, November 3, 2025 [Per J. Rosario, First Division] at 6. This pinpoint citation refers to the copy of the Decision uploaded to the Supreme Court website.

[27] Id.

[28] Id.

[29] Id.

[30] NOTARIAL PRAC. RULE, A.M. No. 02-8-13-SC, July 6, 2004.

[31] NOTARIAL PRAC. RULE, A.M. No. 02-8-13-SC, July 6, 2004.

[32] Heir of Herminigildo A. Unite v. Atty. Guzman, 936 Phil. 740, 749 (2023) [Per J. Lazaro-Javier, Second Division]. (Citations omitted)

[33] Id.

[34] Id.

[35] Id.

[36] Id.

[37] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Sec. 1 of the General Provisions provides:

> Sec. 1. Transitory Provision. — The CPRA 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.

[38] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, Sec. 38(a)(1).

[39] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, Sec. 38(b)(7).

[40] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, Sec. 39.

[41] See Abo v. Ballebar, A.C. No. 13889, January 21, 2026 [Per Curiam, En Banc] at 8-9. This pinpoint citation refers to the copy of the Decision uploaded to the Supreme Court website.

[42] Id.

[43] Atty. Bautista-Regodoz v. Atty. Rubia, 959 Phil. 897, 906 (2024) [Per Curiam, En Banc].

[44] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, sec. 37(b).

[45] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, Sec. 38 (a)(1).

[46] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, Section 38(b)(7).

[47] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, Sec. 39.

[48] See Abo v. Ballebar, A.C. No. 13889, January 21, 2026 [Per Curiam, En Banc].

[49] Id. at 9.

[50] Hedocil-Menioria v. Peralta, A.C. No. 13378, May 19, 2025 [Per J. Kho, Jr., Second Division], citing Orola v. Atty. Baribar, 828 Phil. 1, 10 (2018) [Per J. Peralta, Second Division] and Gaddi v. Atty. Velasco, 742 Phil. 810, 817 (2014) [Per Acting C.J. Carpio, Second Division].

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