

JASON GENE H. BALTAO, COMPLAINANT, VS. ATTY. JESUS NICARDO M. FALCIS III, RESPONDENT.

A.C. No. 14443 [Formerly CBD Case No. 19-5898], November 18, 2025

Ponente: LOPEZ, J.

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LOPEZ, J.:

This administrative case arose from the Complaint[1] filed by Jason Gene H. Baltao (Baltao) against Atty. Jesus Nicardo M. Falcis III (Atty. Falcis III) for violation of Rule 7.03 of the Code of Professional Responsibility.

Kris Aquino (Aquino), a famous television personality and ex-business partner of Baltao, filed multiple counts of qualified theft against Nicko Falcis, brother of Atty. Falcis III. Then, on November 15, 2018, Atty. Falcis III posted in his Twitter account the following:

Yung mga biased na dilawan dyan, halata kayo. Sa allegations ni Kris, paniwalang paniwala na kayo agad. Pero sa allegations namin na she threatened my brother, wala ako naririnig sa inyo? Pakyu kayo mga gago haha check your cognitive biases.[2]

Atty. Falcis III defended his brother from the false accusations raised in several media platforms. Consequently, Baltao filed a complaint before the Integrated Bar of the Philippines-Commission on Bar Discipline (IBP-CBD) against Atty. Falcis III because he used the obscene words "pakyu" and "gago" in his Twitter account, which was clearly unbecoming of a lawyer.[3]

For his part, Atty. Falcis III filed his Verified Answer-Affidavit[4] arguing that he cannot be held liable for violation of Rule 7.03 of the Code of Professional Responsibility. He invoked prior decisions of this Court where it ruled that the word "putang ina" is not really meant to defame but an expression of anger or displeasure.[5] Lastly, he claimed that he did not commit any prior administrative violations given that he was only previously cited by this Court for direct and indirect contempt and the dispositive portion therein only imposed a stem warning on him, thus it was not a penalty.[6]

Subsequently, a mandatory conference was conducted, and the parties submitted their respective position papers. Baltao reiterated that the use of "pakyu" and "gago" undermine the respectability of the legal profession. He argued that this is not Atty. Falcis III's first infraction. Atty. Falcis III was already cited in direct and indirect contempt and meted the penalty of PHP 5,000.00 in a September 3, 2019 Decision[7] of this Court. Atty. Falcis III counter argued that lawyers are entitled to free speech and expression especially in his case that he was only defending his brother from false accusations.[8]

After a thorough examination of the evidence, the IBP-CBD submitted its Report and Recommendation,[9] as follows:

WHEREFORE, premises considered, this Office hereby recommends that respondent be held guilty of violating Canon II, Section 4 of the CPRA for use of abusive, intemperate, offensive or otherwise improper language.

RESPECTFULLY SUBMITTED.[10]

The IBP-CBD recommended that Atty Falcis III be held liable for Canon II, Section 4 of the Code of Professional Responsibility and Accountability[11] (CPRA). While Atty. Falcis III was only defending his brother and expressing his frustrations, his use of profanity and intemperate language should be dealt with accordingly. Otherwise, it would erode the dignity of the legal profession. It added that Atty. Falcis III shall suffer the penalty for a lighter offense under Canon VI, Section 37 of the CPRA with one aggravating circumstance of indirect contempt offset by one mitigating circumstance of being a first offender.

In its Resolution[12], the IBP-Board of Governors modified the Report and Recommendation[13] of the Investigating Commissioner, thus:

RESOLUTION NO. XXVI-CRM-2024-04-04

RESOLVED, to MODIFY, as it is hereby MODIFIED, the Report and Recommendation of the Investigating Commissioner (IC), in finding respondent Atty. Jesus Nicardo Falcis III guilty and liable for a light offense in violation of Canon 2, section 4 of the Code of Professional Responsibility and Accountability (CPRA), with one aggravating circumstance of indirect contempt offset by one mitigating circumstance of being a first time offender, and to recommend to mete out upon him the penalties of FINE of [PHP] 17, 500 and REPRIMAND, with STERN WARNING that a repetition of the same or similar act shall be dealt with more severely.[14]

The core issue is whether respondent Atty. Jesus Nicardo Falcis III should be administratively liable of Canon II, Section 4 of the CPRA.

This Court's Ruling

This Court emphasized that the practice of law is a privilege bestowed only to those who possess and continue to possess the qualifications for the legal profession. Accordingly, lawyers are duty-bound to maintain not only a high standard of legal proficiency, but also morality, honesty, integrity, and fair dealing. Otherwise stated, this Court will not hesitate to discipline an erring lawyer by imposing an appropriate penalty based on the exercise of sound judicial discretion.[15]

Canon II, Section 4 and 37 of the CPRA provides:

CANON II

Propriety

....

SECTION 4. Use of dignified, gender-fair, and child- and culturally-sensitive language. — A lawyer shall use only dignified, gender-fair, child-and culturally-sensitive language in all personal and professional dealings.

To this end, a lawyer shall not use language which is abusive, intemperate, offensive or otherwise improper, oral or written, and whether made through traditional or electronic means, including all forms or types of mass or social media.

....

Responsible Use of Social Media

....

SECTION 37. Online posts. — A lawyer shall ensure that [their] online posts, whether made in a public or restricted privacy setting that still holds an audience, uphold the dignity of the legal profession and shield it from disrepute, as well as maintain respect for the law.

Here, the respondent justified his use of the words "pakyu" and "gago" by explaining that he only uttered such

words out of passion to express his anger and displeasure against the supporters of Aquino and that he only acted in defense of his brother and the latter's reputation. However, the respondent could have remained in the realm of legal discourse by showing the news articles regarding the cases they filed against Aquino and make solid arguments. Rather, he used profanity to verbally attack what he referred to as "dilawans" or supporters of Aquino. Clearly, this behavior falls short of the expected conduct of a lawyer.

Further, as a lawyer, respondent must understand the consequences of uttering vulgar words in his Twitter account, its risks, and ethical implications, including the likelihood of it spreading indiscriminately, becoming available to anyone on social media, and the influence that it could have on lawyers and non-lawyers alike, not to mention the children who have been exposed to social media. Evidently, respondent failed to take these implications and consequences into account, and in doing so, he likewise failed in upholding the directive to responsibly use social media.

In *Malabed v. Atty. De la Peña*,^[16] this Court reminded lawyers to refrain from using improper language because it undermines the dignity of the legal profession.

While respondent is entitled and very much expected to defend himself with vigor, he must refrain from using improper language in his pleadings. In *Saberon v. Larong*, we stated: [W]hile a lawyer is entitled to present his case with vigor and courage, such enthusiasm does not justify the use of offensive and abusive language. Language abounds with countless possibilities for one to be emphatic but respectful, convincing but not derogatory, illuminating but not offensive.

On many occasions, the Court has reminded members of the Bar to abstain from all offensive personality and to advance no fact prejudicial to the honor or reputation of a party or witness, unless required by the justice of the cause with which he is charged.^[17]

Further, in *Sps. Nuezca v. Atty. Villagarcia*,^[18] this Court emphasized that:

Though a lawyer's language may be forceful and emphatic, it should always be dignified and respectful, befitting the dignity of the legal profession. The use of intemperate language and unkind ascriptions has no place in the dignity of judicial forum. Language abounds with countless possibilities for one to be emphatic but respectful, convincing but not derogatory, and illuminating but not offensive. In this regard, all lawyers should take heed that they are licensed officers of the courts who are mandated to maintain the dignity of the legal profession, hence, they must conduct themselves honorably and fairly. Thus, respondent ought to temper his words in the performance of his duties as a lawyer and an officer of the court.^[19] (Citations omitted)

Respondent cannot exculpate himself by claiming that he was only defending his brother. He should be reminded that the manner in which it was done should be consistent with the high standards of conduct and morality expected from the members of the Bar.

Finally, while freedom of expression is guaranteed by the Constitution, the lawyer's oath and their duties and responsibilities ultimately serve as a limit thereto. Notably, lawyers should be cautious in their postings online. They are reminded to always practice restraint in their conduct, be it in real life or in social media. Otherwise stated, the rule of law may totally be circumvented and rendered nugatory by blatantly seeking public sympathy on social media.^[20]

More, the use of social media entails responsibility as it encompasses a vast audience and may not easily be restricted. Canon II, Section 36 of the CPRA mandates a lawyer's duty to understand the ethical implications of the use of social media, as follows:

SECTION 36. Responsible use. — A lawyer shall have the duty to understand the benefits, risks, and ethical implications associated with the use of social media.

In Request of the Public Attorney's Office to Delete Section 22, Canon III of the Proposed Code of Professional Responsibility and Accountability,[21] Atty. Acosta was penalized for failure to take into account the risks and ethical implications associated with social media when she publicized the Public Attorney's Office's request to delete Canon III, Section 22 of the CPRA. Aside from emphasizing the responsible use of social media, this Court likewise emphasized the need for lawyers to conduct themselves in a dignified manner. Canon II, Section 2 of the CPRA reads:

SECTION 2. Dignified conduct. — A lawyer shall respect the law, the courts, tribunals, and other government agencies, their officials, employees, and processes, and act with courtesy, civility, fairness, and candor towards fellow members of the bar.

A lawyer shall not engage in conduct that adversely reflects on one's fitness to practice law, nor behave in a scandalous manner, whether in public or private life, to the discredit of the legal profession.

Jurisprudence has recognized misconduct as an intentional wrongdoing or a deliberate violation of a rule of law or standard of behavior, whether work-related or not. To stress; there must be a transgression of some established and definite rule of action.[22] There are two types of misconduct, namely: grave misconduct and simple misconduct. In grave misconduct, as distinguished from simple misconduct, the elements of corruption, clear intent to violate the law, or flagrant disregard of an established rule must be manifest.[23] Without any of these elements, the transgression of an established rule is properly characterized as simple misconduct only.[24]

It must be emphasized that at the time respondent made his post on Twitter, a case was already pending before the appropriate court against a charge for which respondent may help the cause of his brother, by advancing the appropriate legal arguments. However, instead of advancing legal arguments before the appropriate tribunal, respondent resorted to personal attacks against persons who are supporting not only the cause of Aquino but the group of dilawan, publicly known to support the administration of then President Benigno Aquino III. This was even published through social media, which has a wide reach, giving the impression that lawyers may throw invectives against supporters of a litigant in a case. This is a misconduct that tends to discredit the legal profession. The mandate to use social media responsibly among lawyers strengthens the trust of the public in the legal profession and must always be borne in mind by every lawyer. Respondent clearly failed to align his conduct in this mandate.

For respondent's failure to comply with this mandate, even directing his misconduct against supporters who are not even parties to the case filed by Aquino against his brother, respondent must be held liable for simple misconduct, which is classified as a less serious offense, there being no manifest elements of corruption, clear intent to violate the law, or flagrant disregard of established rules.[25]

As regards the penalty, Canon VI, Section 37 of the CPRA provides for sanctions:

Section 37. Sanctions. —

(a)

If the respondent is found guilty of a serious offense, any of the following sanctions, or a combination thereof, shall be imposed:

(1)

Disbarment;

(2)

Suspension from the practice of law for a period exceeding six (6) months;

(3)

Revocation of notarial commission and disqualification as notary public for not less than two (2) years; or

(4)

A fine exceeding [PHP] 100,000.00.

(b)

If the respondent is found guilty of a less serious offense, any of the following sanctions, or a combination thereof, shall be imposed:

(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.

(c)

If the respondent is found guilty of a light offense, any of the following sanctions shall be imposed:

(1)

A fine within the range of [PHP] 1,000.00 to [PHP] 35,000.00;

(2)

Censure; or

(3)

Reprimand.

In addition to the above sanctions in paragraph (c), the respondent may also be required to do community service or service in the IBP legal aid program.

In all instances, when the offense involves money or property owed, which is intrinsically linked to the lawyer-client relationship, the respondent shall be ordered to return the same.

The CPRA states that in determining the appropriate penalty to be imposed, this Court may, in its discretion, appreciate some modifying circumstances which include a finding of previous administrative liability where a penalty is imposed, regardless of nature or gravity.[26] Here, this Court resolves to increase the penalty imposable against respondent due to his previous administrative infractions of direct and indirect contempt and the gravity of his action in using profane and obscene words.

In the imposition of a penalty where aggravating circumstances are present, Canon VI, Section 39 of the CPRA provides:

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.

Applying the foregoing provision, this Court imposes against respondent the penalty of suspension of one year from the practice of law. It must be emphasized that social media are web-based platforms that enable online interaction and facilitate users to generate and share content. There are various classifications of social media platforms and one can be classified under the "social networking sites" such as Twitter.[27] Certainly, Twitter's public nature facilitates complex and unexpected interactions that breed viral events which can reach millions of users. Further, "dilawan" is used as a term to describe members of Liberal Party, those belonging to then President Aquino III's administration to distinguish them from other political groups. Clearly, this fosters polarization between political groups instead of constructive engagement. Thus, as for the penalty imposed against respondent, this Court deems it proper to modify the penalty to suspension of one year from the practice of law.

ACCORDINGLY, this Court finds respondent Atty. Jesus Nicardo M. Falcis III GUILTY of simple misconduct and he is SUSPENDED from the practice of law for a period of one year. Respondent Atty. Jesus Nicardo M. Falcis III is STERNLY WARNED that a repetition of the same or similar infraction will be dealt with more severely by this Court.

Let a copy of this Decision be furnished to the Office of the Bar Confidant to be appended to respondent Atty. Jesus Nicardo M. Falcis III's personal record as an attorney; the Integrated Bar of the Philippines for its information and guidance; and the Office of the Court Administrator for circulation to all the courts.

The Integrated Bar of the Philippines is directed to furnish the local chapter to which the respondent belongs a copy of this Decision.

After completing his one year suspension, respondent Atty. Jesus Nicardo M. Falcis III shall file with the Office of the Bar Confidant a Sworn Statement pursuant to Section 45 of the Code of Professional Responsibility and Accountability.

SO ORDERED.

Lazaro-Javier, Kho, Jr., and Villanueva, JJ., concur.

Leonen, SAJ. (Chairperson), see separate concurring opinion.

[1] Rollo, pp. 2-6.

[2] Id. at 42.

[3] Id. at 43.

[4] Id. at 11-17.

[5] Id.

[6] Id. at 73.

- [7] *Falcis v. Civil Registrar General*, 861 Phil. 388 (2019) [Per J. Leonen, En Banc].
- [8] Rollo, p. 74.
- [9] *Id.* at 72-76.
- [10] *Id.* at 76.
- [11] A.M. No. 22-09-01-SC, April 11, 2023.
- [12] Rollo, pp. 70-71. The April 3, 2024 Resolution in CDB Case No. 19-5898 was penned by National Secretary Doroteo B. Aguila of the Board of Governors, Integrated Bar of the Philippines, Pasig City.
- [13] *Id.* at 72-76.
- [14] *Id.* at 70.
- [15] *Alcantara v. Atty. Salas*, 867 Phil. 676, 683 (2019) [Per J. J. Reyes, Jr., First Division].
- [16] 780 Phil. 462 (2016) [Per J. Carpio, En Banc].
- [17] *Id.* at 467.
- [18] 792 Phil. 535 (2016) [Per J. Perlas-Bernabe, First Division].
- [19] *Id.* at 540.
- [20] *Lao v. Atty. Causing*, 930 Phil. 538, 547 (2022) [Per Curiam, En Banc].
- [21] 951 Phil. 638 (2024) [Per J. Singh, En Banc].
- [22] *Office of the Ombudsman v. PS/Supt. Espina*, 807 Phil. 529, 541 (2017) [Per Curiam, First Division].
- [23] *Ganzon v. Arlos*, 720 Phil. 104, 113 (2013) [Per J. Bersamin, En Banc].
- [24] *Imperial, Jr. v. Government Service Insurance System*, 674 Phil. 286, 296 (2011) [Per J. Brion, En Banc].
- [25] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, sec. 34 states:
- SECTION 34. Less serious offenses. — Less serious offenses include:
- (a)
- Simple misconduct, or such misconduct without the manifest elements of corruption, clear intent to violate the law or flagrant disregard of established rules[.]
- [26] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, sec. 38(b)(l).
- [27] *Re: Disturbing Social Media Posts of Lawyers/Law Professors*, 939 Phil. 475 (2023) [Per Curiam, En Banc].

CONCURRING OPINION

LEONEN, SAJ.:

Lawyers must conduct themselves with dignity in all their public and private dealings and use proper language in any medium of communication used.

I concur with the ponencia that respondent Atty. Jesus Nicardo M. Falcis III should be meted the penalty of suspension for one year.[1]

Canon II, Section 4 of the Code of Professional Responsibility and Accountability explicitly enjoins lawyers to use dignified and proper language in all their dealings:

CANON II
PROPRIETY

SECTION 4. Use of dignified, gender-fair, and child- and culturally-sensitive language. — A lawyer shall use only dignified, gender-fair, child- and culturally-sensitive language in all personal and professional dealings.

To this end, a lawyer shall not use language which is abusive, intemperate, offensive or otherwise improper, oral or written, and whether made through traditional or electronic means, including all forms or types of mass or social media.

As stated in the ponencia, there are aggravating circumstances[2] that attended respondent's failure to conduct himself in a dignified manner befitting a member of the legal profession. First, respondent already committed previous administrative infractions of direct contempt and indirect contempt for which he was imposed a fine of PHP 5,000.00.[3]

Second is the gravity of his action in using derogatory words, specifically the term "dilawan," which generalizes people who support the Liberal Party or the administration of former President Benigno Aquino III (President Aquino III). The use of such term tends to polarize and create antagonism among political groups, instead of encouraging healthy discourse. To make matters worse, respondent posted his statement on his Twitter account, ensuring the publicity of his words.

To add, respondent did not show remorse for his actions. In his Answer-Affidavit, he argued that he cannot be held administratively liable on the ground that his words were merely an expression of anger or displeasure. However, his passion to defend his brother does not excuse his use of offensive and improper language, especially in an online public forum. Further, it is erroneous for him to state that this Court did not previously impose a penalty on him as he was only sternly warned after he was found guilty of indirect contempt. Contrary to his claim, the dispositive portion of this Court's Decision in *Falcis v. Civil Registrar General*[4] clearly ordered him "to pay a fine [PHP 5,000.00] within thirty (30) days from notice." [5]

Likewise, contrary to the findings of the Board of Governors of the Integrated Bar of the Philippines, the mitigating circumstance of first offense cannot be considered in favor of respondent as he already incurred a previous administrative liability.[6]

Canon VI, Section 39 of the Code of Professional Responsibility and Accountability provides the manner of imposing penalties when modifying circumstances are present:

CANON VI
ACCOUNTABILITY

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)

Thus, with three aggravating circumstances and no mitigating circumstance, this Court may impose the penalty of suspension pursuant to Canon VI, Section 39.

This Court has previously imposed heavier penalties upon lawyers who use offensive or improper language in their private dealings.

In *Belo-Henares v. Atty. Guevarra*,^[7] Atty. Guevarra was found to have violated the Code of Professional Responsibility after he posted on his Facebook account statements insulting Dr. Maria Victoria G. Belo-Henares, calling her a "quack doctor," "Reyna ng Kaplastikan," and "Reyna ng Payola," among others.^[8] This Court did not give credence to Atty. Guevarra's defense that his statements were private remarks made in his private account considering that he failed to show proof that he used the privacy tools available to restrict his posts to only a few users.^[9] Likewise, this Court held that "as a lawyer, he is bound to observe proper decorum at all times, be it in his public or private life."^[10] Atty. Guevarra was then suspended for a period of one year.^[11]

In *Batac v. Atty. Jubay*,^[12] this Court resolved that Atty. Jubay's use of intemperate and offensive language, such as "puta," "Japayuki," and "prostitute," even in his private communication, is a violation of the Code of Professional Responsibility. As such, he was meted the penalty of suspension for a period of one year.^[13]

In *Bautista v. Atty. Ferrer*,^[14] Atty. Ferrer was suspended for one year for uttering offensive language, including, "putang ina mo" and "ang kapal ng mukha mo" in her attempt to recover the money that she lent.^[15]

Finally, in *Felix v. Atty. Gadon*,^[16] Atty. Gadon hurled offensive and insulting language, including "putang ina," "hayop na iyan," "mga bobong dilawan," and "[r]est in hell," among others while being interviewed in a radio-television show, after the announcement that former President Aquino III had passed away.^[17] This Court found untenable Atty. Gadon's defense that the prohibition on the use of offensive or improper language is limited only to a lawyer's professional dealings. Considering the higher standard of conduct required of lawyers, they are expected to avoid scandalous behavior in both public and private life.^[18] Since Atty. Gadon had already been disbarred, this Court imposed a fine of PHP 150,000.00 instead.^[19]

In this case, respondent's use of offensive language is clearly unbecoming of a member of the legal profession as he not only generalized a group of people with the term "dilawan," but also insulted them with the words, "pakyu" and "gago." The fact that he posted his statement on a public social media account, which can reach a wide range of audience, only adds insult to injury. Respondent's social media post was clearly intended as a rage bait^[20] to bring attention to the situation his brother was involved in. As this Court previously observed on the use of social media:

The more viral online content is, as assessed from the volume of people who saw the original post or by way of shared posts within the same platform or cross-posting other social media, the greater its effect and propensity to affect the public. The language employed may also be deliberately used to infuriate the public to generate more public engagement.^[21]

The Code of Professional Responsibility and Accountability instructs lawyers to use social media in a responsible manner:

RESPONSIBLE USE OF SOCIAL MEDIA

A lawyer shall uphold the dignity of the legal profession in all social media interactions in a manner that enhances the people's confidence in the legal system, as well as promote its responsible use.

SECTION 36. Responsible use. — A lawyer shall have the duty to understand the benefits, risks, and ethical implications associated with the use of social media.

SECTION 37. Online posts. — A lawyer shall ensure that his or her online posts, whether made in a public or restricted privacy setting that still holds an audience, uphold the dignity of the legal profession and shield it from disrepute, as well as maintain respect for the law.

Respondent's invocation of his right to free speech also does not deserve merit as this Court has held that "the freedom of speech of lawyers is not absolute." [22] Additionally, "lawyers are licensed officers of the court who are mandated to maintain the dignity of the legal profession, hence, they must conduct themselves honorably and fairly at all times, in all places." [23]

Thus, to serve as a clear and constant reminder that lawyers must always conduct themselves with honor and dignity, whether in their professional or personal dealings, respondent should be suspended from the practice of law for one year.

ACCORDINGLY, I vote to find respondent Atty. Jesus Nicardo M. Falcis III GUILTY of simple misconduct. Respondent Atty. Jesus Nicardo M. Falcis III should be SUSPENDED from the practice of law for a period of one year.

[1] Ponencia, p. 9.

[2] CODE OF PROF. RESPONSIBILITY & ACCOUNTABILITY, Canon VI, sec. 38(b) states in part:

SECTION 38. Modifying circumstances. — In determining the appropriate penalty to be imposed, the Court may, in its discretion, appreciate the following mitigating and aggravating circumstances: . . .

(b) Aggravating circumstances: (1) Finding of previous administrative liability where a penalty is imposed, regardless of nature or gravity;

. . . .

(6) Lack of remorse;

. . . .

(8) Other analogous circumstances.

[3] Ponencia, p. 2.

[4] 861 Phil. 388 (2019) [Per J. Leonen, En Banc].

[5] Id. at 564.

[6] Id.

[7] 801 Phil. 570 (2016) [Per J. Perlas-Bernabe, First Division].

[8] Id. at 587.

[9] Id. at 585.

[10] Id. at 588.

[11] Id. at 589.

[12] A.C. No. 11643, August 22, 2022 [Unsigned Resolution, Second Division].

[13] Id.

[14] 855 Phil. 743 (2019) [Per J. Peralta, Third Division].

[15] Id. at 752.

[16] 951 Phil. 620 (2024) [Per Curiam, En Banc].

[17] Id. at 620-621.

[18] Id. at 633.

[19] Id. at 635.

[20] "Rage bait" is defined by the Oxford University Press as "online content deliberately designed to elicit anger or outrage by being frustrating, provocative, or offensive, typically posted in order to increase traffic to or engagement with a particular web page or social media content," available at <https://corp.oup.com/news/the-oxford-word-of-the-year-2025-is-rage-bait/> (last accessed December 9, 2025).

[21] ABS-CBN Corporation v. Ampatuan, Jr., 941 Phil. 182, 319 (2023) [Per SAJ. Leonen, En Banc].

[22] Id. at 261.

[23] Moya v. Atty. Greta, 915 Phil. 1, 23 (2021) [Per Curiam, En Banc], citing Spouses Nuezca v. Villagarcia, 792 Phil. 535, 540 (2016) [Per J. Perlas-Bernabe, First Division].

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