

(RE: PENALTY IMPOSED BY JUDGE TEOFILO GUADIZ, JR., CFI, BRANCH V, NUEVA ECIJA, IN CRIMINAL CASE NO. 604, ENTITLED, “PEOPLE OF THE PHILIPPINES VERSUS FROILAN MAGLAYA”;.)

A.M. No. 1553-CFI. September 12, 1980

Ponente: DE CASTRO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/a-m-no-1553/>

DE CASTRO, J.:

On March 4, 1977, the Court required Judge Teofilo Guadiz, Jr., CFI of Nueva Ecija to explain why he should not be held administratively liable for incompetence and/or ignorance of the law for not specifying the minimum and maximum periods of the imprisonment meted out by him in Criminal Case No. 604 under the Indeterminate Sentence Law. In compliance therewith, respondent judge submitted the following explanation:

(1) Since accused former Judge Froilan Maglaya has been charged and convicted for violation of Sec. 2 of Pres. Decree No. 583 which is not an offense penalized by the Revised Penal Code or its amendments, it is obvious that the last portion of Sec. 1 of the Indeterminate Sentence Law is applicable which provides that if the offense is punished by any other law, the Court shall sentence the accused to an indeterminate sentence, the maximum of which shall not exceed the maximum fixed by said law and the minimum shall not be less than the minimum term prescribed by the same.

(2) The penalty imposed is the whole penalty of prision mayor the minimum of which is 6 years and one day and the maximum of which is 12 years.

(3) There is substantial compliance with the last portion of Sec. 1 of the Indeterminate Sentence Law, when the penalty is prision mayor, it being understood that the minimum thereof is not less than six (6) years and one (1) day, and the maximum, not more than 12 years.

The court finds the explanation not satisfactory. The provision of the Indeterminate Sentence Law is very explicit in its applicability even as to offenses punished by special laws not by the Revised Penal Code. Presidential Decree No. 583 is such special penal statute.

The need for specifying the minimum and maximum periods of the indeterminate sentence is to prevent the unnecessary and excessive deprivation of liberty and economic usefulness of the accused, since he may be exempted from serving the entire sentence, depending upon his behavior and his physical, mental and moral record. The requirement of imposing an indeterminate sentence in all criminal offenses, whether punished by the Revised Penal Code or by special laws, with definite minimum and maximum terms, as the Court deems proper within the legal range of the penalty specified by the law must, therefore, be deemed mandatory. Compliance with this requirement should have appeared to respondent judge particularly clear and easy in the case in question, where the penalty is given in the same term as those prescribed for offenses punished under the Revised Penal Code, that of prision mayor, which, like all the other penalties prescribed in said Code, except the indivisible

penalties, have minimum and maximum periods for easy determination of the indeterminate sentence to be imposed, in terms of specific number of years, months and days both in its minimum and maximum periods.

WHEREFORE, respondent Judge Guadiz is hereby ADMONISHED that a repetition of similar acts in the future will be dealt with more severely by the Court. Let a copy of this resolution be attached to the personal record of Judge Guadiz.

SO ORDERED.

Makasiar, Fernandez, Guerrero, and Melencio-Herrera, JJ., concur.

Teehankee, J., (Chairman), I concur, adding only the note that our action in this administrative matter against respondent Judge Guadiz should in no way be taken as prejudging the correctness of his judgment of conviction of the accused, former Judge Froilan Maglaya, which is presently pending determination on appeal.

ABOUT BATAS.ORG

Study smarter at BATAS.org

The Philippine bar review and law-school companion built around how your brain actually remembers.

The complete Philippine law library - free for everyone.

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

Audio case-brief lectures.

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

Bar review built on the science of memory.

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

The full law-school curriculum.

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

Mock exams that tell you where you stand.

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

A study planner that keeps you on pace.

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

Start free at <https://batas.org>

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.