

THE COURT ADMINISTRATOR, COMPLAINANT, VS. RAMON D. SANGALANG, RESPONDENT.

Adm. Mat. No. P-2624. January 30, 1982

Ponente: TEEHANKEE, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/e7e59a562f69/>

TEEHANKEE, J.:

Respondent Ramon D. Sangalang, employed as clerk in the Court of First Instance of Bataan, was charged in the Sandiganbayan with the crime of malversation of public property in an information filed in Criminal Case No. 3563, which reads as follows:

"That in September of 1980 and sometime prior and subsequent thereto, in Balanga, Bataan, Philippines, and within the jurisdiction of this Honorable Sandiganbayan, the said accused, being then an employee as Clerk III in the Court of First Instance Branch I of Bataan designated as vault-in-charge and as such responsible in the custody and safekeeping of all records and exhibits in the possession of the said Court of First Instance Branch I, did then and there willfully, unlawfully and feloniously with grave abuse of confidence take away from among the exhibits in his custody, misappropriate and embezzle to his own personal use and benefit the following:

- 1) one (1) U.S. .30 caliber carbine rifle with Serial No. 8271132 worth P1,200.00;
- 2) one (1) .45 caliber pistol worth P1,200.00;
- 3) one (1) .30 caliber Smith and Wesson revolver worth P1,000.00;
- 4) one (1) .22 caliber revolver (paltik) worth P200.00,

to the damage and prejudice of the government in the total sum of P3,600.00, Philippine Currency."

Upon arraignment, respondent pleaded guilty and on October 13, 1981, the Sandiganbayan rendered a decision finding respondent guilty beyond reasonable doubt of the crime of malversation of public property as defined and penalized under Art. 217 of the Revised Penal Code and appreciating in his favor the mitigating circumstances of voluntary surrender and plea of guilty, sentenced him to "an indeterminate penalty ranging from one (1) year and one (1) day of prision correccional as minimum to three (3) years, six (6) months and twenty-one (21) days of prision correccional as maximum, to suffer perpetual special disqualification, to return to the Court of First Instance of Bataan, Branch I, the property malversed by him . . . or to indemnify said agency the value thereof in the amount of P3,600.00 if he fails to do so, to a fine of P3,600.00 equivalent to the value of said properties with subsidiary imprisonment in case of insolvency." The said decision became final and executory on October 28, 1981.

The Office of the Court Administrator, pursuant to the Court's Resolution of March 12, 1981,[*] filed on October 29, 1981, after the finality of respondent's conviction, the present administrative complaint against the said respondent for dishonesty, serious misconduct and conduct prejudicial to the best interest of the service. In a 3rd Indorsement dated November 17, 1981, respondent stated that "in view of his conviction by the Sandiganbayan for the same offense, he is no longer filing any answer to the administrative complaint filed against him."

Considering his waiver and since the records of the case sufficiently provide a basis for the determination of respondent's administrative liability, it is needless to conduct a formal investigation of the charges (Aquino vs. Aficial, 81 SCRA 22; Lawan vs. Moleta, 90 SCRA 579; Flores vs. Tatad, 96 SCRA 676).

The facts of record and respondent's guilty plea and conviction of the criminal charge of malversation of public property entrusted to him likewise plainly manifest his guilt of the administrative charges at bar against him and warrant his separation from the service and forfeiture of retirement benefits to which he might otherwise be entitled.

Considering specially that respondent's final conviction by the Sandiganbayan carries with it the penalty of perpetual special disqualification, which perpetually deprives respondent of a public office held by him and disqualifies him from the holding of any other public office or employment (Article 31, Revised Penal Code), respondent is deemed separated from the service as of October 28, 1981, the date when the judgment of conviction in Criminal Case No. 3563 became final and executory.

ACCORDINGLY, respondent is hereby declared and ordered separated from the service effective as of October 28, 1981 with forfeiture of retirement benefits and with prejudice to reinstatement to any branch of the government or any of its agencies or instrumentalities.

SO ORDERED.

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

[*] "Authorizing, as a matter of policy, the Office of the Court Administrator to initiate motu proprio the filing of administrative proceedings against judges and/or employees of the inferior courts who have been convicted and/or charged before the Sandiganbayan or the courts"

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.