

****Title:**** Campos v. Campos - A.M. No. 681 Phil. 247 (2015) February 28, 2005 (Case Brief / Digest)

****Facts:****

1. On September 9, 1981, Aida R. Campos and Eliseo M. Campos were married and later had two children, Alistair and Charmaine.
2. On July 16, 2008, Eliseo filed a petition for Declaration of Nullity of Marriage before the Regional Trial Court of Bayugan, Agusan del Sur, citing psychological incapacity. Eliseo alleged he was homosexual and that Aida had extramarital affairs.
3. Aida opposed the nullity petition, denying Eliseo's claims and alleging his motive was to annul the marriage so he could marry another woman. She filed for legal separation instead.
4. Concurrently, Eliseo executed an affidavit of loss for the title of Lot No. 4747-A, purportedly lost while in his possession, and sought annotation by the Register of Deeds. However, Aida claimed the title was in Alistair's possession and accused Eliseo of attempting to reclaim property preemptively.
5. Eliseo countered, declaring the title affidavit was to protect his interests after learning that Aida and Alistair intended to use the property as loan collateral.
6. The case escalated to the Supreme Court as Aida, Alistair, and Charmaine filed complaints alleging Eliseo's immorality, serious misconduct, and dishonesty.

****Issues:****

1. Whether Eliseo M. Campos is guilty of serious misconduct, immorality, and dishonesty.
2. Whether Eliseo manipulated legal processes regarding the property registration to defraud potential judgment-obligees.

****Court's Decision:****

1. ****Immorality and Dishonesty:**** The Court found no evidence supporting the allegations of immorality or dishonesty, as no relationship with another woman by Eliseo was established, and the claim of homosexuality required trial court determination within nullity proceedings. Therefore, the Court absolved him on these counts, underscoring the distinct personal restrictions judges must manage due to constant public scrutiny.

2. ****Misconduct:****

- The Court identified simple misconduct in Eliseo's actions causing the property registration under minor Alistair's name, aiming to dodge obligations in possible adverse judgment scenarios.
- This action, defined by rule transgression with potential deceitful intent (albeit not rising to corruption), justified sanctioning under Rule 140.

3. **Sanction:** Considering Eliseo's resignation effective July 1, 2009, a monetary fine was imposed instead of suspension. The Court decided upon a P20,000 fine, differing slightly from OCA's proposal by aligning with the defined penalty spectrum.

Doctrine:

- **Simple Misconduct:** As per the Court, an act by a public official defying legal norms, even absent corruption, warranting penalties. Here, the doctrine was applied to underscore the ethical obligations of judiciary members in property affairs.
- **Judicial Conduct:** Reinforces the need for judicial comportment reflecting utmost integrity and public respect, per Canon 4, New Code of Conduct for the Philippine Judiciary.

Class Notes:

- Judicial ethics demand personal sacrifices due to public office.
- Misconduct without corruption can still result in punitive measures.
- Homosexuality claims in annulment are trial court matters.
- Misuse of legal processes to guard against potential judgments (property registration in minor's name) constitutes simple misconduct.

Historical Background:

The case explores themes of judicial accountability and personal conduct expected of judges amid intense public inspection. It underscores evolving judicial standards regarding personal life scrutiny and the ethics governing judicial officers' decisions affecting family and property disputes, reflecting shifts in societal norms and judicial administration principles.