

**\*\*Title: Felongco, et al. v. Judge Luis Dictado\*\***

**\*\*Facts:\*\***

Multiple grievances were filed against Judge Luis Dictado, presiding over the Regional Trial Court of Camarines Norte, concerning various appellate reversals and alleged judicial misconduct. The cases involved several complainants, including Adelaida P. Felongco, Atty. Jose L. Lakap, Delfin Ang, Catalino Jerez, and Florencia B. Ropeta, who charged Judge Dictado with several offenses including knowingly rendering unjust judgments, facilitating the undue issuance of writs, refusing to comply with appellate restraining orders, and misuse of contempt powers among other allegations.

1. **\*\*Adelaida P. Felongco Case\*\***: Felongco filed a forcible entry complaint in a municipal court, which was favorable to her. On appeal to the Regional Trial Court, Judge Dictado reversed the decision and issued a writ of execution the same day. The Court of Appeals reversed Dictado's decision, and the Supreme Court sustained the appellate court's decision.
2. **\*\*Atty. Lakap's Complaints\*\***: Atty. Lakap accused Judge Dictado of graft, corruption, unjust judgment rendering, and misuse of contempt powers. Dictado allegedly received benefits from litigants and rendered decisions that lacked impartiality.
3. **\*\*Delfin Ang Case\*\***: Following a vehicular accident case, Judge Dictado denied Ang's appeal on account of a procedural error regarding notice periods, which the Court of Appeals later overturned due to a lack of due process.
4. **\*\*Catalino Jerez Case\*\***: Jerez was convicted of grave threats by Dictado without adequate evidential re-examination, which the Supreme Court then regarded as a violation of due process because adequate defense efforts were hindered.
5. **\*\*Florencia Ropeta Case\*\***: Ropeta accused Dictado of decision antedating, infidelity in document custody, and impartial judgment rendering, which were substantiated by appellate reversals.

The cases were collectively investigated by an assigned Justice from the Court of Appeals who reported to the Supreme Court.

**\*\*Issues:\*\***

1. Did Judge Dictado knowingly render unjust judgments?
2. Was Judge Dictado guilty of facilitating undue writ issuances and contempt powers misuse?
3. Did he exhibit unethical conduct, including receiving benefits from litigants?
4. Was Judge Dictado guilty of procedural falsifications, such as decision antedating and case delays?

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

The Supreme Court rendered Judge Dictado guilty of various infractions. Key findings were:

1. **\*\*Knowingly Unjust Judgment & Writ Issuance\*\***: The judge was found guilty of rendering biased judgments, specifically demonstrated in the Felongco case where immediate execution orders were issued improperly.
2. **\*\*Contempt Powers Misuse\*\***: Judge Dictado misused his contempt powers, notably in the Delfin Ang and Atty. Lakap cases, to suppress criticism and protect questionable judicial conduct.
3. **\*\*Graft and Corruption\*\***: Despite dismissing some graft complaints upon inconclusive evidence, Judge Dictado was deemed to have accepted undue privileges from litigants, compromising judicial impartiality.
4. **\*\*Procedural Delinquencies\*\***: The Court held that Dictado did delay decision promulgations beyond constitutional limits masking substantial judgment biases.

The totality of Dictado's misconduct led to his dismissal from judiciary service, forbidding his future public office occupations.

**\*\*Doctrine:\*\***

The case emphasized the adherence to Canons of Judicial Conduct, ensuring impartiality, integrity, and diligence. The necessity for immediate and transparent promulgation of decisions within constitutional deadlines was reinforced. It stressed the judiciary's utmost integrity, demanding all judicial officers avoid conduct casting doubt on judicial neutrality.

**\*\*Class Notes:\*\***

- **\*\*Judicial Impartiality\*\***: Judges must not favor any parties, maintain impartiality, and

A.M. NO. MTJ-05-1582 (FORMERLY OCA I.P.I. NO. 03-1492-MTJ).

February 28, 2005 (Case Brief / Digest)  
avoid any appearance of impropriety (Code of Judicial Conduct).

- **Due Process**: Parties should receive timely notices, decisions, and opportunities for appeal.
- **Contempt Powers**: Exercise restraint; cannot be used to oppress criticism.
- **Disciplinary Actions**: Misconduct can entail severe penalties, including dismissal and bans on future public service roles.

**Historical Background:**

The case reflects post-Martial Law judicial reforms in the Philippines focusing on eradicating judicial corruption while enhancing the transparency and accountability of judicial officers. This case highlighted systemic issues prevalent in certain judiciary sectors and became a precedent for the judiciary's stringent anti-corruption position reiterating post-EDSA Revolution reforms.