

****Title:**** Juanito L. Haw Tay vs. Hon. Eduardo Singayao, A.M. No. R-592-RTJ

****Facts:****

In 1986, Mr. Juanito L. Haw Tay filed an administrative complaint with the Philippine Supreme Court against Judge Eduardo Singayao of the Regional Trial Court, Branch 14, Cotabato City. He accused Judge Singayao of violating the Anti-Graft and Corrupt Practices Act (Republic Act No. 3019, as amended) and gross ignorance of the law.

Judge Singayao, in his defense, denied the accusations and claimed systematic harassment by the complainant. The Supreme Court referred the case to Associate Justice Eduardo Bengzon of the Court of Appeals for investigation and temporarily suspended Judge Singayao from his judicial position.

Procedurally, the hearings were delayed multiple times primarily due to Judge Singayao's failure to appear. He cited financial difficulties as his reason for being absent. Despite rescheduling attempts, he continuously failed to attend the hearings. Consequently, the Investigating Justice declared that Judge Singayao waived his right to cross-examine complainant's witnesses, though he was still permitted to present his own evidence. Justice Bengzon completed the investigation ex parte.

Justice Bengzon found that Judge Singayao had solicited money and a plane ticket from the complainant through his Court Interpreter, Mr. Benjamin Pascual. This occurred several times during 1983 in relation to two cases pending before his court. Furthermore, Judge Singayao accepted a check, instead of the required bond, for issuing a preliminary injunction, an act reflecting gross ignorance of the law.

****Issues:****

1. Did Judge Singayao violate the Anti-Graft and Corrupt Practices Act by soliciting bribes from a litigant?
2. Did Judge Singayao demonstrate gross ignorance of the law in his judicial proceedings?

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

- ****Violation of the Anti-Graft and Corrupt Practices Act:**** The Supreme Court found Judge Singayao guilty of soliciting money and other favors from litigants in exchange for favorable court ruling manipulations. The Court adopted the findings that Judge Singayao demanded and received money and a plane ticket from Juanito L. Haw Tay on multiple occasions, amounting to displays of serious misconduct. This violated the strict code of conduct expected from a judicial officer.

- **Gross Ignorance of the Law:** Judge Singayao was found to have committed gross ignorance of the law by allowing a check, rather than an actual bond, as security for a preliminary injunction. This misstep led to judicial anomalies and cast doubt on his competence to administer judicial duties effectively.

Given the findings, the Supreme Court expressed its strong condemnation of Judge Singayao's actions and ruled that he would have been dismissed from service had his resignation not already been accepted. Moreover, it declared him ineligible for any government employment and recommended potential disbarment, instructing him to provide reasons against disbarment within a specific period.

Doctrine:

The case reiterates the judiciary's intolerance of corruption and incompetence within its ranks. It underscores the expectation that judges uphold the highest standards of integrity, impartiality, and competence. Misconduct in soliciting bribes constitutes a severe breach meriting disqualification and forfeiture of retirement privileges. Additionally, any deviation from procedural law could denote gross ignorance warranting similar consequences.

Class Notes:

- **Anti-Graft and Corrupt Practices Act:** Section 3(b) – Solicitation or acceptance of gifts in exchange for favorable public actions is prohibited.
- **Judicial Misconduct:** Encompasses any deviation from legal ethics, especially involving corruption or incompetence.
- **Preliminary Injunction Requirements:** Under Rule 58 of the Rules of Court, a bond or its equivalent must be appropriately filed to secure a preliminary injunction.

Historical Background:

The Philippines during the 1980s was a period of political transition following the end of the Marcos regime in 1986. Judicial reforms were critical in reaffirming public trust in the judiciary post-martial law. This case reflects the continuing efforts of the Supreme Court to cleanse the judiciary of corrupt practices inherited during previous administrations, aligning judicial conduct with newfound democratic principles and accountability.