

**\*\*Title:\*\*** ADMINISTRATIVE COMPLAINT AGAINST JUDGE JAIME T. HAMOY FOR VIOLATIONS OF JUDICIAL CONDUCT

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

Complainant Jose E. Fernandez, acting as counsel for the plaintiff in two civil cases filed with the Regional Trial Court of Zamboanga City, Branch 15, noticed an inordinate delay in the resolution of Civil Case No. 3645 and Civil Case No. 2744. Despite over a decade passing, Judge Jaime T. Hamoy failed to decide on these cases and had taken the case records with him to his new post in Caloocan City without proper clearance.

1. **\*\*Initiation of the Complaint:\*\***

- On January 7, 1997, Fernandez sent a letter to the Court Administrator requesting assistance to expedite these cases.
- The letter was forwarded by Senior Deputy Court Administrator Reynaldo L. Suarez to Judge Hamoy for his comments or actions.

2. **\*\*Failure to Respond:\*\***

- Judge Hamoy did not respond, prompting Court Administrator Alfredo L. Benipayo to instruct him to submit a comment within ten days, a directive which Judge Hamoy again ignored.

3. **\*\*Escalation of Directives:\*\***

- On April 3, 2001, Deputy Court Administrator Jose P. Perez sent the first tracer, insisting on the submission of a comment within five days. Judge Hamoy provided no feedback.
- Consequently, a resolution required him to show cause for non-compliance and to file the required comment.

4. **\*\*Delayed Compliance and Subsequent Developments:\*\***

- Judge Hamoy eventually filed an Explanation/Compliance, stating forgetfulness and misplacement of records as reasons, claiming the cases were decided in 2003.
- He agreed to submit the administrative case against him for resolution without a formal investigation.

5. **\*\*Office of the Court Administrator's Findings:\*\***

- Evaluation led to a recommendation for a penalty on Judge Hamoy—a fine of Forty Thousand Pesos (P40,000) and a warning of severe penalties for any further delays.

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

1. Whether Judge Hamoy is liable for gross inefficiency due to the delay in deciding Civil Cases Nos. 3645 and 2744.
2. Whether Judge Hamoy violated Canon 3, Rule 3.05 of the Code of Judicial Conduct.
3. Whether Judge Hamoy disrespected judicial directives and failed to comply with the orders from the Office of the Court Administrator and the Supreme Court.
4. Whether Judge Hamoy committed gross misconduct by signing false certificates of service.

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

- **\*Issue 1:\*** The court found Judge Hamoy guilty of gross inefficiency, as prolonged delays (13 years) constitute a direct failure in his responsibilities to decide cases within the reglementary period.
- **\*Issue 2:\*** Judge Hamoy violated Canon 3, Rule 3.05 by failing to dispose of cases promptly.
- **\*Issue 3:\*** Judge Hamoy displayed disrespect towards higher judicial authority by failing to comply with the directives issued by the Office of the Court Administrator, which constitutes borderline contumacy.
- **\*Issue 4:\*** Judge Hamoy falsified certificates of service, asserting no pending cases, thereby engaging in gross misconduct.

On account of these findings and the weight of prior admonishments against Judge Hamoy, the Supreme Court deemed dismissal from service, with the forfeiture of retirement benefits but preserving accrued credits, to be an appropriate sanction.

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

1. **\*\*Responsibility to Decide Promptly:\*\*** The judiciary is entrusted with the vital responsibility of resolving cases within explicit timeframes to maintain public confidence and uphold justice.
2. **\*\*Administrative Responsibility:\*\*** Judges must organize and supervise court personnel effectively to prevent any procedural inefficiencies.
3. **\*\*Judicial Compliance and Integrity:\*\*** Compliance with directives from higher courts is obligatory for all judges, and any misconduct or inefficiency significantly erodes judicial credibility.

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

- **\*\*Key Concepts:\*\*** Gross inefficiency, judicial conduct, administrative responsibility, respect for higher judicial authority.

- **Relevant Provisions:**

- Rule 3.05 of the Code of Judicial Conduct
- Section 8(3), Rule 140 of the Revised Rules of Court
- **Application:** Delay amounts to inefficiency; judges must request timely extensions if needed and respect directives from higher tribunals.

**Historical Background:**

This case highlights systemic issues in case management within the Philippine judicial system, reflecting lingering inefficiencies that impede the swift administration of justice—a recurring concern since the foundational days of an organized judiciary. These insights reinforce continuous calls for judicial reforms to fortify procedural timeliness and accountability.