

**\*\*Title:\*\***

Ronald Soriano vs. Court of Appeals, et al.

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

1. On December 7, 1993, Ronald Soriano was convicted of Reckless Imprudence resulting in homicide, serious physical injuries, and damage to property.
2. Soriano's application for probation was granted on March 8, 1994, with specific conditions including family responsibility, pursuit of specific employment, and indemnification of the victim's heirs amounting to P98,560.00.
3. On April 26, 1994, Assistant Prosecutor Benjamin A. Fadera filed a motion to cancel Soriano's probation for failing to satisfy his civil liability and for committing another crime.
4. The Zambales Parole and Probation Office recommended that Soriano continue probation and submit a payment plan for his civil liability.
5. On June 20, 1994, the trial court denied the prosecutor's motion, requiring Soriano to submit a payment plan.
6. Probation Officer Nelda Da Maycong later discovered that Soriano's father received P16,500.00 in insurance related to the incident but did not pay it to the heirs, asking the court to cite Soriano for contempt.
7. The trial court ordered Soriano to explain his non-compliance and submit a payment plan on August 15, 1994. Soriano claimed he did not receive notice of the June 20 order due to his counsel's lapse.
8. On October 4, 1994, the trial court found Soriano in contempt and revoked his probation for multiple violations, including failure to meet family obligations, cooperate with supervision, and provide a payment plan.
9. Soriano filed a certiorari petition with the Court of Appeals, which was dismissed. The appellate court upheld the trial court's decision, finding Soriano in defiance of lawful orders.
10. Soriano petitioned the Supreme Court for review citing errors in upholding contempt and probation revocation due to his alleged non-compliance.

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

1. Did the Court of Appeals err in failing to find that the trial judge committed grave abuse of discretion in citing Soriano for contempt?
2. Was there grave abuse of discretion in revoking Soriano's probation based on failure to satisfy civil liability and conditions of probation?
3. Does requiring satisfaction of civil liability as a probation condition violate the constitutional guarantee of equal protection?

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

1. **\*\*Contempt Finding:\*\***

- The Supreme Court held that Soriano's refusal to submit a payment plan was deliberate as he received notice of the trial court's orders. The Court found no abuse of discretion in the contempt citation.

2. **\*\*Probation Revocation:\*\***

- The revocation was upheld as lawful. The Court emphasized that probation terms were statutory, and Soriano's non-compliance justified the trial court's decision to revoke probation.

3. **\*\*Civil Liability as Probation Condition:\*\***

- The Court found no violation of equal protection. The satisfaction of civil liability was a continued management condition of an already granted probation, not a prerequisite.

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

- Probation conditions are statutory and must be met for continued probation eligibility. Non-compliance may lawfully result in revocation.
- Satisfaction of civil liability constitutes a valid condition for probation, which, if unfulfilled, justifies judicial remedial action including revocation.

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

- Probation is a discretionary privilege, not a right.
- Key statutory conditions of probation: cooperation with supervision, meeting family duties, and maintaining specific employment.

- The principle of notice: Notice to counsel equals notice to client.
- Equal Protection Clause is not violated by civil liability payment conditions after probation is granted.

**\*\*Historical Background:\*\***

The case reflects the legal standards surrounding the grant of probation in the Philippines, aiming for offender rehabilitation while fulfilling criminal justice objectives, including the victim's compensation. This ruling underscores the judiciary's stance on balancing offender reintegration with ensuring accountability for civil obligations arising from crimes.