

Title: Atty. Raul L. Correa vs. Judge Medel Arnaldo B. Belen

Facts:

Atty. Raul L. Correa filed a complaint against Judge Medel Arnaldo B. Belen, alleging misconduct during his tenure as presiding judge of the Regional Trial Court, Branch 36, Calamba City, Laguna. Correa, initially appointed as a co-administrator in the intestate estate of Hector Tan, experienced hostility from Judge Belen during court proceedings. Judge Belen challenged various elements of the Administrator's Report, including an audited financial statement, disallowing them outright. At one instance, he scolded the estate's accountant, calling her incompetent, and threatened to report her to the regulatory body for accountants.

Judge Belen publicly rebuked Correa during a session for errors in managing the estate, dismissing it as particularly embarrassing given Correa's distinguished background as a University of the Philippines law graduate and bar topnotcher. The Judge later ousted Correa as co-administrator and cited him for indirect contempt for, allegedly with Rose Ang Tee, unlawfully withdrawing funds from Hector Tan's estate, an action described as "contumacious."

Correa contended that the contempt citation was unjust, as he had explained his actions as being in good faith and beneficial to the estate, helping save it a large sum through a government tax amnesty program.

Procedurally, the complaint and comment from Belen were referred by the Supreme Court to the Office of the Court Administrator (OCA) for evaluation. The OCA found Judge Belen's use of intemperate language towards counsels inappropriate and recommended his reprimand. This is articulated in an OCA Report, which suggests a fine and stern warning against future similar conduct.

Issues:

1. Whether Judge Belen's conduct during court proceedings constituted misconduct and conduct unbecoming of a judge.
2. Whether the Judge's statements and actions towards complainant Atty. Correa and others were inappropriate under the New Code of Judicial Conduct for the Philippine Judiciary.

Court's Decision:

The Supreme Court decided that Judge Belen was guilty of conduct unbecoming of a judge for the use of intemperate language and inappropriate handling of Atty. Correa. The Court

emphasized that judges must consistently show propriety, preserving the judiciary's dignity and upholding the thorough integrity of their office. Judge Belen's conduct was noted as previous incidents were not denied but sought to be justified.

Concerning the first issue, the Court acknowledged Judge Belen's repeated misconduct of engaging in displays of arrogance, noting past reprimands for similar behavior. Regarding the second issue, Judge Belen violated principles outlined in the New Code of Judicial Conduct, failing to exhibit patience and courtesy expected of the judicial position.

Doctrine:

Judges must exemplify propriety and behave in a manner fitting their role, sustaining judicial office dignity. They must avoid conduct unbecoming of their status and adhere to Canon 4 of the Code that insists on constant propriety.

Class Notes:

- Conduct unbecoming of a judge is a light offense punishable under Section 11 (c) of Rule 140 of the Revised Rules of Court, which provides fines, censure, reprimands, or admonitions as potential penalties.
- The New Code of Judicial Conduct requires judges to demonstrate propriety and avoid language or actions that degrade the judiciary's perceived impartiality and integrity (Canon 4).

Historical Background:

The case reflects ongoing judicial reforms emphasizing accountability and professionalism within the judiciary in the Philippines. In light of repeated complaints and emerging reports of improper demeanor by judicial officers, the Supreme Court prioritizes such administrative issues to safeguard public trust in the legal system, aiming to address and minimize instances of judicial misconduct.