

# RECENT JURISPRUDENCE ON LEGAL ETHICS\*

## INTRODUCTION

This article provides an overview of select Supreme Court decisions on legal and judicial ethics promulgated in 2021. The decisions selected are illustrative of the various responsibilities of a lawyer, not just to their clients, but also to the society, the legal profession, and the courts. Furthermore, the article discusses judicial clemency and the reciprocal doctrine as applied to disbarment cases, and the integrity and propriety of conduct for judges.

## I. THE LAWYER AND THE SOCIETY AND THE LEGAL PROFESSION

### A. *Hosoya v. Contado*<sup>1</sup>

In *Hosoya v. Contado*, the Court disbarred lawyer and politician Allan C. Contado, who had abandoned his wife and cohabited with another with whom he had two children. This case highlighted that the return of property cannot be ordered in a disciplinary proceeding.

The administrative case against Atty. Contado was initiated by Crisanta G. Hosoya, the woman with whom Atty. Contado cohabited and had two daughters. The case was for alleged continuous violations of several laws, including the Anti-Child Abuse Law,<sup>2</sup> Anti-Violence Against Women and their Children Act,<sup>3</sup> and carnapping.<sup>4</sup>

---

\* Cite as *Recent Jurisprudence on Legal and Judicial Ethics*, 95 PHIL. L.J. 1008, [page cited] (2022). This was prepared by Editorial Assistants Adrian P. Alconel, Jules Duke M. Contreras, Celine Mae D. Dael, Arielle T. Esteban, and Alyssa J. Sobere, and reviewed by Atty. Ruby Rosselle L. Tugade, Senior Lecturer in the UP College of Law and Vice Chair of the JOURNAL's Volume 88 Student Editorial Board.

This article is part of a series published by the JOURNAL, providing updates in jurisprudence across the eight identified fields of the law. The other articles focus on political law, labor law, taxation law, civil law, mercantile law, criminal law, and remedial law.

<sup>1</sup> [Hereinafter "*Hosoya*"], A.C. No. 10731, Oct. 5, 2021.

<sup>2</sup> Rep. Act No. 7610 (1992). Special Protection of Children Against Abuse, Exploitation, and Discrimination Act.

<sup>3</sup> Rep. Act No. 9262 (2004). Anti-Violence Against Women and Their Children Act of 2004.

<sup>4</sup> See *Hosoya, supra*, at 3, n. 22. Here, it was clarified that the complaint did not specify if the carnapping allegation was simple theft or under the special penal law. This pinpoint citation refers to the copy of the decision uploaded in the Supreme Court Website.

Hosoya originally agreed to be in a relationship with Atty. Contado under the latter's promise that he is working on the dissolution of his marriage. Years later, Hosoya discovered that Atty. Contado was also cohabiting with and had impregnated other women. Hosoya also claimed that Atty. Contado failed to provide support sufficient for their daughters' needs, and that he took her vehicle. In response, Atty. Contado denied the allegations, arguing that he provided what he can to their daughters. As for the issue on the car, he admitted that the car was in his possession, but he claims that Hosoya voluntarily lent him the car for use in Eastern Samar.<sup>5</sup>

The Integrated Bar of the Philippines ("IBP") Commission on Bar Discipline ("CBD") ruled that Atty. Contado is guilty of immorality for cohabiting and siring children with Hosoya despite having a legal wife. Further, the Committee stated that Atty. Contado's failure to return the subject vehicle constituted conduct unbecoming of a member of the Bar. The IBP Board of Governors ("BOG") recommended the penalty of disbarment.<sup>6</sup>

The Supreme Court agreed with the IBP's recommendation on the imposition of the penalty of disbarment. It is well-settled that a married person's abandonment of his or her spouse to live with and cohabit with another constitutes gross immorality as it amounts to either adultery or concubinage. In this case, Atty. Contado admitted that he cohabited and had children with a woman who is not his legal wife. In essence, this admission, according to the Court, is also an admission that he is living a life of deceit and immorality.<sup>7</sup>

It is a well-settled doctrine that for disbarment to be imposed as penalty, the acts complained of should not only be immoral, but must be grossly immoral. Previous rulings of the Court have ruled that the penalty of disbarment is proper when the erring lawyer is guilty of committing gross immoral conduct in abandoning the legal spouse in order to cohabit with another person.<sup>8</sup> With this, the Court found Atty. Contado guilty of gross

---

<sup>5</sup> *Id.* at 2–4.

<sup>6</sup> *Id.* at 5–6.

<sup>7</sup> *Id.* at 7–9.

<sup>8</sup> *See* *Chan v. Carrera*, A.C. No. 10439, Sep. 3, 2019; *Ceniza v. Ceniza*, A.C. No. 8335, Apr. 10, 2019; *Panagsagan v. Panagsagan*, A.C. No. 7733, Oct. 1, 2019

immorality in violation of Rule 1.01<sup>9</sup> and Rule 7.03<sup>10</sup> of the CPR and ordered his disbarment.<sup>11</sup>

The Court, however, ruled that it cannot order the return of the subject vehicle to Hosoya as the case is a disciplinary proceeding. The proper remedy would be to file a civil or criminal case before the trial courts, as this matter of recovery of the vehicle does not have any relation to the lawyer's administrative liability.<sup>12</sup>

### **B. *Juni v. Juni***<sup>13</sup>

In contrast to the preceding case, the Court in *Juni v. Juni* chose to merely suspend a lawyer found guilty of gross immorality as he did not deny having an affair with a married woman.<sup>14</sup>

Floreswinda Juni filed a complaint for disbarment against her husband Atty. Mario Juni for gross immorality for having sexual intercourse with Ruth S. Vaguchay, a married woman, and contracting a second marriage despite a legally subsisting first marriage. Atty. Juni fathered two children with Ruth in 2001 and in 2003, before his first marriage was annulled.<sup>15</sup>

For his part, Atty. Juni used his conversion to the Islamic faith as a defense. He explained that he had converted to Islam in 2000, even before his de facto separation with the complainant in 2002. With this, Atty. Juni counters that his second marriage to Ruth is not scandalous as they are living as legitimate husband and wife, and their children even carry his name.<sup>16</sup>

The IBP CBD recommended the penalty of censure against Atty. Juni upon finding him administratively liable for his grossly immoral act of contracting two marriages and having sexual relations with a married woman. Consequently, the IBP BOG modified the recommendation of the IBP CBD

---

<sup>9</sup> Rule 1.01 provides that “[a] lawyer shall not engage in unlawful, dishonest, immoral[,] or deceitful conduct.”

<sup>10</sup> Rule 7.03 provides that “[a] lawyer shall not engage in conduct that adversely reflects on his fitness to practice law, nor shall he whether in public or private life, behave in a scandalous manner to the discredit of the legal profession.”

<sup>11</sup> *Hosoya*, *supra* note 1, at 9–10.

<sup>12</sup> *Id.* at 10.

<sup>13</sup> [Hereinafter “*Juni*?”], A.C. No. 11599, Aug. 3, 2021.

<sup>14</sup> *Id.* at 7. This pinpoint citation refers to the copy of this decision uploaded to the Supreme Court Website.

<sup>15</sup> *Id.* at 1–2.

<sup>16</sup> *Id.* at 3–4.

and instead recommended the penalty of disbarment against Atty. Juni for contracting a bigamous marriage.<sup>17</sup>

The Supreme Court ruled that Atty. Juni in fact violated Rules 1.01 and 7.03 of the CPR. In this case, pieces of evidence have shown that Atty. Juni and Ruth had an illicit relationship even before the de facto separation of Atty. Juni and the complainant. In fact, the eldest child with Ruth was born in 2001, a year before their supposed de facto separation. As regards his defense that he already converted to Islam as early as 2000, there was no evidence presented to prove this factual defense. Even assuming this were true, the Court stressed that his act of carrying on an illicit affair and siring two children out of wedlock was reprehensible and cannot be countenanced.<sup>18</sup>

However, the Supreme Court did not agree with the IBP's recommendation of disbarment, ruling that Atty. Juni's transgression by itself does not show his unfitness to remain a lawyer. Atty. Juni did not deny his transgressions, and instead "exhibited candor due to his religious belief that he is now a converted [M]uslim." The Court reiterated the doctrine that disbarment is a last resort. Absent any showing that his transgression affected his standing and character, suspension would be enough as penalty. With this, the Court suspended Atty. Juni from the practice of law for five years.<sup>19</sup>

### C. *Velasco v. Atty. Causing*<sup>20</sup>

In *Velasco v. Atty. Causing*, the Court suspended Atty. Berteni C. Causing for breaching the rule on confidentiality under the Family Courts Act of 1997<sup>21</sup> and his duties under Rules 8.01,<sup>22</sup> 13.02,<sup>23</sup> and 19.01<sup>24</sup> of the

---

<sup>17</sup> *Id.* at 4.

<sup>18</sup> *Id.* at 5–6.

<sup>19</sup> *Id.* at 7.

<sup>20</sup> [Hereinafter "*Velasco*"], A.C. No. 12883, Mar. 2, 2021.

<sup>21</sup> Rep. Act. No. 8369 (1997).

<sup>22</sup> Rule 8.01 provides that "[a] lawyer shall not, in his professional dealings, use language which is abusive, offensive or otherwise improper."

<sup>23</sup> Rule 13.02 provides that "[a] lawyer shall not make public statements in the media regarding a pending case tending to arouse public opinion for or against a party."

<sup>24</sup> Rule 19.01 provides that "[a] lawyer shall employ only fair and honest means to attain the lawful objectives of his client and shall not present, participate in presenting or threaten to present unfounded criminal charges to obtain an improper advantage in any case or proceeding."

CPR.<sup>25</sup> It discussed the responsibilities of lawyers regarding the exercise of the freedom of the press and of expression.

In a Facebook post, Atty. Causing characterized complainant Enrico R. Velasco as a “*wise polygamous husband*” who filed a petition for the declaration of nullity of the latter’s marriage with Causing’s client Nina Ricci Narvaez Laudato “to prevent the second wife’s criminal case of bigamy from succeeding.”<sup>26</sup> The subject post did not mention Velasco by name, but included photographs of his petition in the nullity case.<sup>27</sup> Atty. Causing also sent the subject post in a direct message to the complainant’s son, and posted the same in a public group with approximately 3,500 members. Consequently, the post gained negative traction against Velasco, prompting the latter to file an administrative case for disbarment.<sup>28</sup>

In his defense, Atty. Causing contended that he was merely “performing his duties as the ‘spokesman-lawyer’ of his client,” and that his imputations were not tantamount to libel “as he was only telling the truth.” He further insisted on his constitutional right to press freedom as a “journalist-blogger” when he published the subject post.<sup>29</sup>

The IBP found Atty. Causing liable for breaching the rule on the confidentiality of family court proceedings. It was recommended that he be meted with the penalty of suspension from the practice of law for two years.<sup>30</sup>

The Court found Atty. Causing liable and stressed that “a lawyer is not allowed to divide his personality as an attorney at one time and a mere citizen at another.” The duties a lawyer holds as a member of the bar remain unchanged under any circumstance. By his publication of confidential information on the nullity case, Atty. Causing violated Section 12 of the Family Courts Act of 1997.<sup>31</sup> Further, the freedom of speech is not absolute. With the use of the words “polygamous,” “criminal,” and “cheater,” the subject post was purposely published to elicit a negative public opinion

---

<sup>25</sup> *Velasco, supra*, at 7. This pinpoint citation refers to the copy of this decision uploaded to the Supreme Court Website.

<sup>26</sup> *Id.* at 2.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at 2–3.

<sup>29</sup> *Id.* at 3.

<sup>30</sup> *Id.* at 4.

<sup>31</sup> *Id.* at 5–6.

against the complainant, contrary to the mandate of lawyers to “employ only fair and honest means to attain the lawful objectives of his client.”<sup>32</sup>

Similar to the ruling in *Belo-Henares v. Atty. Guevarra*,<sup>33</sup> the Court decreased the suspension period to one year with a stern warning against repetition of the same.

## II. THE LAWYER AND THE CLIENT

### A. *Nicolas v. Laki*<sup>34</sup>

Despite its finding that the lawyer is guilty of violating multiple provisions of the CPR, the Court ruled in *Nicolas v. Laki* that it cannot impose the penalty of disbarment, in light of the rule against double disbarment in our jurisdiction.<sup>35</sup>

Norma Nicolas filed a disbarment complaint against Atty. Jose Laki for violation of multiple rules of the CPR. Nicolas obtained the services of Atty. Laki in November 2005 to handle a her brother’s annulment case. Atty. Laki informed Nicolas that he would file the case in Balanga City, Bataan, because his prior experience has shown that it would be more expedient there. He charged a fee of PHP 130,000 and assured her the proceedings would be finished in just six months. Nicolas gave Atty. Laki an initial payment of PHP 95,000.00. Two months later, Nicolas paid an additional PHP 20,000.00 after Atty. Laki reassured her that the case was almost finished.<sup>36</sup>

For a time, Nicolas could not reach Atty. Laki but when contact was established, the latter made excuses and claimed the judge’s reluctance was the reason for the delay. However, he reassured her by alleging that he had managed to convince the judge to rule in their favor. After losing contact with Atty. Laki once again, Nicolas took it upon herself to check on the status of the annulment case. She discovered that no case was ever filed by

---

<sup>32</sup> *Id.* at 6–7.

<sup>33</sup> A.C. No. 11394, Dec. 1, 2016.

<sup>34</sup> [Hereinafter “*Nicolas*”], A.C. No. 12881, Feb. 9, 2021.

<sup>35</sup> *Id.* at 9. This pinpoint citation refers to the copy of this decision uploaded to the Supreme Court Website.

<sup>36</sup> *Id.* at 2.

the Atty. Laki. She then sought Atty. Laki's disbarment for violating the CPR.<sup>37</sup>

The IBP found Atty. Laki guilty of violating the aforementioned provisions in the CPR. The IBP noted that this was not the first time that Atty. Laki is accused of this transgression. In fact, in *Mariano v. Laki*,<sup>38</sup> decided by the Court in 2018, Atty. Laki was already disbarred by the Court. With this, the IBP recommended that Atty. Laki be disbarred anew.<sup>39</sup>

The Supreme Court held that Atty. Laki violated his sworn duties under the CPR. The Court acknowledged that what happened in *Mariano* is similar to what happened in this case, just with a different victim. Atty. Laki's omissions in rendering an accounting and returning the money if the intended purpose thereof did not materialize constituted disregard of Rule 16.01<sup>40</sup> of the CPR. Further, Atty. Laki's act of telling complainant that he could get a favorable decision should he file the petition in Bataan and boasting that he could sway the presiding judge showed his disrespect toward the independence of the Judiciary. His actions gave the false impression that judges may be influenced causing public confidence in the Judiciary to erode thus violating Canon 15.<sup>41</sup> Atty. Laki violated Rule 18.03<sup>42</sup> when he neglected to file the petition for nullity of marriage, the very pleading which would have initiated the entire process.<sup>43</sup>

It is true that this time, the Court has more reason to disbar Atty. Laki than it did in *Mariano*. The Court found Atty. Laki guilty of violating six rules of the CPR.<sup>44</sup> However, the Court cannot disbar Atty. Laki once more because of the principle against the imposition of double disbarment. Instead, the Court imposed the fine of PHP 40,000, in addition to the fine already imposed by the IBP for failure to comply with the IBP's directives. The Court also ordered the return of the PHP 115,000 payment of Nicolas

---

<sup>37</sup> *Id.* at 3.

<sup>38</sup> [Hereinafter "*Mariano*"], A.C. No. 11978, Sept. 25, 2018.

<sup>39</sup> *Nicolas*, *supra* note 34, at 3–4.

<sup>40</sup> Rule 16.01 provides that "[a] lawyer shall account for all money or property collected or received for or from the client."

<sup>41</sup> Canon 15 directs lawyers to "observe candor, fairness, and loyalty in all [their] dealings and transactions with [their] clients"

<sup>42</sup> Rule 18.03 provides that "[a] lawyer shall not neglect a legal matter entrusted to him, and his negligence in connection therewith shall render him liable."

<sup>43</sup> *Nicolas*, *supra* note 34, at 4–8.

<sup>44</sup> Rules 1.01, 11.04, 15.06, 16.01, 16.03, and 18.03

with 12% interest per annum from 2007 until June 30, 2013, and thereafter 6% per annum from July 1, 2013 until fully paid.<sup>45</sup>

### **B. *Bernasconi v. Demaisip***<sup>46</sup>

The case of *Bernasconi v. Demaisip* is illustrative of the well-settled principle that the relationship between a lawyer and his or her client is fiduciary in nature.

Jaime Ignacio Bernasconi filed an administrative complaint against Atty. Belleza Demaisip. Bernasconi had engaged Atty. Demaisip's legal services for the transfer of ownership of a parcel of land. Upon receiving the estimated cost of the transfer, Bernasconi paid the amount to Atty. Demaisip. However, no transfer certificate of title (TCT) was delivered, prompting a demand for refund.<sup>47</sup>

Atty. Demaisip refunded a portion of the amount to Bernasconi and issued a check for the remaining amount. The check was dishonored upon presentment. After several demands, Atty. Demaisip issued a promissory note to pay the balance instead, but yet again, she failed to fulfill her promise. This prompted the filing of the administrative charge, in addition to the separate criminal charges.<sup>48</sup>

In her defense, Atty. Demaisip claimed that the cost of the transfer involved an amount larger than what she had originally estimated, thus, the money entrusted to her was not enough to process the transfer of ownership. She claims that since Demaisip is already demanding for the return of the money, she had no choice but to issue a check as a guaranty. Further, she claimed that her attorney's fees were not deducted from the amount being demanded.<sup>49</sup>

The IBP observed that Demaisip did not deny issuing a check that was dishonored for being drawn against a closed account. While the criminal case did not prosper, the investigating prosecutor had found probable cause, showing Atty. Demaisip's disregard for the law of the land. Inconsistent with her defense, she had never informed Bernasconi that he owed her attorney's

---

<sup>45</sup> *Nicolas, supra* note 34, at 9–10.

<sup>46</sup> [Hereinafter "*Bernasconi*"], A.C. No. 11477, Jan. 19, 2021.

<sup>47</sup> *Id.* at 1–2. This pinpoint citation refers to the copy of this decision uploaded to the Supreme Court Website.

<sup>48</sup> *Id.* at 2.

<sup>49</sup> *Id.*



fees. Even then, this would not have served to relieve her of her duty to account for the money received. She also proceeded to issue a worthless check, an act manifesting willful dishonesty and immoral conduct that undermines public confidence in the legal profession.<sup>50</sup>

Notwithstanding Bernasconi's eventual withdrawal of the administrative complaint filed, the Court found Atty. Demaisip guilty of violating the Rules 1.01, 16.01, and 16.03,<sup>51</sup> and Canon 16<sup>52</sup> of the CPR, and suspended her from the practice of law for two years.<sup>53</sup>

The Court cited *Del Mundo v. Capistrano*,<sup>54</sup> which held that when a client entrusts money to a lawyer for a specific purpose, such money, if not utilized, be immediately returned upon demand, otherwise a presumption of misappropriation arises. Atty. Demaisip had not submitted any valid reason for her failure to return the money.<sup>55</sup>

### C. *Constantino v. Aransazo*<sup>56</sup>

The case of *Constantino v. Aransazo* is illustrative of the principle that a lawyer's fiduciary relationship extends not just to matters that involve money, but also to matters that involve confidential information.

Atty. Rogelio S. Constantino filed a complaint for disbarment against Atty. Nemesio Aransazo for disclosing confidential information acquired in the course of their lawyer-client relationship.<sup>57</sup>

Atty. Constantino engaged the services of Atty. Aransazo as counsel in a case for the annulment of extrajudicial proceedings, that involved a house and lot mortgaged by Hope Claire Aldaba to Eduardo Tongco, as a

---

<sup>50</sup> *Id.* at 3.

<sup>51</sup> Rule 16.03 provides that “[a] lawyer shall deliver the funds and property of his client when due or upon demand. However, he shall have a lien over the funds and may apply so much thereof as may be necessary to satisfy his lawful fees and disbursements, giving notice promptly thereafter to his client. He shall also have a lien to the same extent on all judgments and executions he has secured for his client as provided for in the Rules of Court.”

<sup>52</sup> Canon 16 directs lawyers to “hold in trust all money and properties of [their] client[s] that may come into [their] profession.”

<sup>53</sup> *Bernasconi*, *supra* note 46, at 5–6.

<sup>54</sup> A.C. No. 6903, Apr. 16, 2012.

<sup>55</sup> *Bernasconi*, *supra* note 46, at 6–7.

<sup>56</sup> A.C. No. 9701, Feb. 10, 2021.

<sup>57</sup> *Id.* at 1. This pinpoint citation refers to the copy of this decision uploaded to the Supreme Court Website.

security for a loan. The creditor-mortgagee Tongco thereafter assigned his rights in favor of Atty. Constantino and Atty. Aransazo, for an alleged consideration of over PHP 2 million. The two lawyers then filed the extrajudicial proceedings over the mortgaged property.<sup>58</sup>

In the pre-trial of the annulment of extrajudicial proceedings case, the lawyer of the debtor-mortgagor Aldaba manifested that Atty. Aransazo had executed a sworn statement that allegedly reveals that the deed of assignment by Tongco in favor of Atty. Constantino and Atty. Aransazo was executed without consideration, and therefore null and void. With this revelation, Atty. Constantino filed the administrative complaint against Atty. Aransazo for disclosing matters confided during the course of lawyer-client relations.<sup>59</sup>

The IBP CBD recommended the dismissal of the complaint for lack of merit because there was no lawyer-client relationship between the two parties. However, the IBP BOG opined that there was in fact lawyer-client relations and that Atty. Aransazo violated his responsibility of preserving the secrets of his client. As such, the BOG recommended the suspension of Atty. Aransazo for three months. Upon the motion for reconsideration of Atty. Aransazo, the Office of the Bar Confidant (OBC) evaluated the case and thereafter recommended a longer suspension period of six months.<sup>60</sup>

The Court ruled that there is indeed a lawyer-client relationship between Atty. Constantino and Atty. Aransazo. The Court clarified that notwithstanding personal relationship between Atty. Constantino and Atty. Aransazo and the fact that the legal advice was given as a personal favor, the moment that Atty. Constantio approached Atty. Aransazo for legal advice, a lawyer-client relationship is established. With this, the Court found that Atty. Aransazo's sworn statement revealing the fact of simulation that rendered the deed of assignment void is a breach of trust. Further, Atty. Aransazo violated the rule against conflict of interest when he served as counsel in the annulment of extrajudicial proceedings case, at the same time, executing the sworn statement that negated his client's arguments and jeopardized the client's interest.<sup>61</sup>

---

<sup>58</sup> *Id.* at 1–2.

<sup>59</sup> *Id.* at 2–3.

<sup>60</sup> *Id.* at 4–5.

<sup>61</sup> *Id.* at 6–10.

Ultimately, the Court suspended Atty. Aransazo for violating Canons 15,<sup>62</sup> 17,<sup>63</sup> and 21 of the CPR.

#### **D. *Sison v. Dumlao***<sup>64</sup>

Lawyers are expected to serve their clients with competence and diligence. The Court reminded lawyers of this basic duty in the case of *Sison v. Dumlao*, where the Court reprimanded a lawyer for being remiss in this duty.

Dr. Eusebio D. Sison filed a complaint against his lawyer Atty. Lourdes Philina B. Dumlao for her failure to attend to her client with the competence and diligence required of a lawyer. In July 2013, Dr. Sison consulted Atty. Dumlao for the filing of an annulment case against his wife. Thereafter, Dr. Sison deposited a sum of money to Atty. Dumlao's bank account to serve as payment for his psychiatric evaluation. However, Atty. Dumlao never gave a single update on the case for nine months. This prompted Dr. Sison to demand the return of the deposited amount, but Atty. Dumlao refused.<sup>65</sup>

In her answer, Atty. Dumlao claimed that she did not profit from Dr. Sison because the money was paid for the latter's psychiatric evaluation; in fact, Dr. Sison met with the psychologist and even received his psychological evaluation report. Additionally, Atty. Dumlao maintained that she could rightfully decline her engagement with Dr. Sison due to conflict of interest. She raised that Dr. Sison's wife was her fifth-degree relative by consanguinity, and that Dr. Sison's mother-in-law had asked her to withdraw her engagement because it would offend the family.<sup>66</sup>

The CBD Investigating Commissioner was of the opinion that the case should be dismissed because there was no contract to engage in legal services yet, and that the conflict of interest explained by Atty. Dumlao is a valid reason to decline engagement. This was adopted by the IBP BOG.<sup>67</sup>

---

<sup>62</sup> Canon 15 directs lawyers to "observe candor, fairness[,] and loyalty in all [their] dealings and transactions with [their] clients."

<sup>63</sup> Canon 17 states that "a lawyer owes fidelity to the cause of his client and he shall be mindful of the trust and confidence reposed in him"

<sup>64</sup> A.C. No. 11959 (Resolution), Apr. 28, 2021.

<sup>65</sup> *Id.* at 1–2. This pinpoint citation refers to the copy of this resolution uploaded to the Supreme Court Website.

<sup>66</sup> *Id.* at 2.

<sup>67</sup> *Id.* at 2–3.

Notwithstanding the foregoing, the Supreme Court upon review ruled that, based on text message exchanges between Dr. Sison and Atty. Dumlao, the latter gave the impression that she already agreed to represent him or give him legal assistance in the prospective annulment case. The Court highlighted that irrespective of the close ties of the lawyer and the client and the non-payment of legal fees, once the lawyer “voluntarily entertains a consultation,” a lawyer-client relationship is established. With this comes the duty on the part of the lawyer to serve the client with diligence and competence.<sup>68</sup>

While it is true that Atty. Dumlao can belatedly refuse to represent Dr. Sison because of the cited conflict of interest, she still had to give him prior notice before withdrawing from the engagement. In this case, Dr. Sison asked for updates from Atty. Dumlao, and the latter never bothered informing Dr. Sison of her disengagement due to conflict of interest.<sup>69</sup>

All these considered, Atty. Dumlao was held administratively liable for violating Rules 18.03<sup>70</sup> and 18.04<sup>71</sup> of the CPR. The Court reprimanded Atty. Dumlao with a stern warning that a repetition of the same act would be dealt with more severely.

### III. JUDICIAL CLEMENCY

#### A. *Nuñez v. Ricafort*<sup>72</sup>

In the case of *Nuñez v. Ricafort*, the Court had the opportunity to lay down new guidelines on judicial clemency.

Soledad Nuñez sought the disbarment of Atty. Romulo Ricafort on the ground of grave misconduct. She had authorized him to sell two parcels of her land for a ten percent commission. He succeeded in selling the lots but did not turn over the proceeds of the successful sale despite multiple

---

<sup>68</sup> *Id.* at 4–6.

<sup>69</sup> *Id.* at 6–7.

<sup>70</sup> Rule 18.03 states that “[a] lawyer shall not neglect a legal matter entrusted to him, and his negligence in connection therewith shall render him liable.”

<sup>71</sup> Rule 18.04 states that “[a] lawyer shall keep the client informed of the status of his case and shall respond within a reasonable time to the client’s request for information.”

<sup>72</sup> A.C. No. 5054 (Resolution), Mar. 2, 2021.

demands for it. This prompted Nuñez to file a civil case for the sum of money against Atty. Ricafort. Even after she won the case, Atty. Ricafort continued to avoid remitting the proceeds of the sale. In a May 29, 2002 decision, the Court indefinitely suspended Atty. Ricafort from the practice of law and ordered him to return the amount of PHP 13,800.00 to Nuñez.<sup>73</sup>

Another disbarment complaint was filed by Erlinda Tarog, who alleged that her family entrusted to Atty. Ricafort a check that should be deposited in court to redeem their bank-foreclosed property. Atty. Ricafort, however, deposited the amount into his personal account. He also failed to file a memorandum required by the court despite having been paid for the additional expenses. He did not return the money despite demands. In the March 15, 2011 decision, the Court, taking into account Atty. Ricafort's previous similar infraction in the *Nuñez* case, finally meted the supreme penalty of disbarment and ordered him to return to Tarog the amount of PHP 80,000.00.<sup>74</sup>

In a third case, Adelita Llunar alleged that in 2000, she hired Atty. Ricafort to file a case for recovery of land and paid him the money to answer for the redemption price of the property, the filing fees, and his legal fees. She found out three years later that the action was never instituted; by this point, Atty. Ricafort was already indefinitely suspended by the Court as a result of the *Nuñez* decision. When Llunar demanded the return of the money, Atty. Ricafort said he assigned the case to another lawyer and would only return the amount that remained in his possession. For violations of the CPR and unauthorized practice of law, the Court in its June 16, 2015 decision in *Llunar v. Ricafort* again imposed the penalty of disbarment and ordered Atty. Ricafort to return to Llunar the amount of PHP 95,000.00.<sup>75</sup>

In 2019, 17 years since his indefinite suspension, Atty. Ricafort at the age of 70 petitioned the Court for clemency in the hopes of leaving his absolution as his legacy. In the petition, he prayed to be reinstated as a member of the Philippine Bar.<sup>76</sup>

This gave the Court the occasion to lay down new clemency guidelines for reinstatement to the Bar. Under the new guidelines, a lawyer

---

<sup>73</sup> *Id.* at 2, *citing* Nuñez v. Ricafort [hereinafter "*Nuñez*"], A.C. No. 5054, 382 SCRA 381, May 29, 2002. This pinpoint citation refers to the copy of this resolution uploaded to the Supreme Court Website.

<sup>74</sup> *Id.*, *citing* Tarog v. Ricafort, A.C. No. 8253, 645 SCRA 320, Mar. 15, 2011.

<sup>75</sup> *Id.* at 3, *citing* Llunar v. Ricafort, A.C. No. 6484, 757 SCRA 614, June 16, 2015.

<sup>76</sup> *Id.*

who has been disbarred is only able to petition for judicial clemency five years from their disbarment at the earliest, unless compelling reasons based on extraordinary circumstances warrant a shorter period. For the Court, five years is the minimum period necessary for a lawyer to effectively reflect on past unbecoming conduct.<sup>77</sup>

After five years, the lawyer may then file a petition for judicial clemency. Upon receipt of the petition, the Supreme Court conducts an evaluation for *prima facie* merit considering the following criteria: (1) compliance with the terms and conditions of all prior disciplinary orders and the five-year period; (2) recognition of the wrongfulness and seriousness of the misconduct for which they were disbarred; and (3) possession of the required integrity and competence to practice law.<sup>78</sup>

A key change introduced in the new guidelines is the forwarding of the meritorious petition to the OBC (or any other fact-finding body) to verify the details and the authenticity of the statements and the evidence attached to the clemency petition.<sup>79</sup> This is to ensure that judicial clemency is objective, not subjective, something that the Court already highlighted earlier in the case of *In re Ong*.<sup>80</sup> The fact-finding body then submits its report to the Court, which shall resolve the clemency petition based on the facts established, applying the threshold of clear and convincing evidence.<sup>81</sup>

The threshold inquiry in a petition for reinstatement to the practice of law is whether the lawyer has sufficiently rehabilitated himself or herself in conduct and character. Clemency is an act of mercy, but the compassion of the Court must always be tempered by the greater interest of the legal profession and the society in general.<sup>82</sup>

Applying these guidelines to Atty. Ricafort's petition, the Court found that he had failed to show *prima facie* merit, since supporting testimonials and certifications were deemed pro-forma and no other valuable corroborative evidence has been presented. Further, Atty. Ricafort had multiple infractions, all of which constituted serious breaches of his fiduciary duties to his past clients.<sup>83</sup>

---

<sup>77</sup> *Id.* at 14.

<sup>78</sup> *Id.* at 14–15.

<sup>79</sup> *Id.* at 15.

<sup>80</sup> *Id.* at 9–10, *citing* A.M. No. SB-14-21-J, Jan. 19, 2021.

<sup>81</sup> *Id.* at 15.

<sup>82</sup> *Id.* at 6.

<sup>83</sup> *Id.* at 16–19.

#### IV. THE RECIPROCAL DOCTRINE

##### A. In re *Lopez*<sup>84</sup>

In the case of *In re Lopez*, the Court laid down the rule that when a foreign court renders a judgment imposing disciplinary penalty, the Filipino lawyer may be imposed a similar judgment in our jurisdiction, provided that the basis of foreign court's judgment includes grounds for the imposition of disciplinary penalty in the Philippines.<sup>85</sup> This "reciprocal doctrine" was applied in the case of *Atty. Jaime V. Lopez*, who was initially disbarred from the practice of law in the State of California.

The State Bar Court of California initiated a disbarment proceeding against *Atty. Lopez* in 1999. It was alleged that he had misappropriated client funds while failing to notify clients of funds he had received and to maintain the same in a trust account. *Atty. Lopez* neither filed a response against these findings nor appeared in the proceedings. Soon after, the Supreme Court of California affirmed the findings of the State Bar Court of California against *Atty. Lopez* and ordered his disbarment.<sup>86</sup>

In the Philippines, the proceeding against *Atty. Lopez* began in 2013. The Supreme Court issued a resolution, which referred the case to the IBP for investigation and recommendation. Following the decision of the State Bar Court of California, the Investigating Commissioner found that the actions of *Atty. Lopez* violated several provisions of the CPR. Consequently, the IBP BOG adopted the report of the Investigating Commissioner and resolved to disbar *Atty. Lopez* from the practice of law.<sup>87</sup>

The Supreme Court affirmed the recommendation of the IBP BOG. The Court found it appropriate to transmute the judgment of disbarment against *Atty. Lopez* in California because the acts that were made the basis of such judgment also constitute grounds of disbarment under the Court's jurisdiction in the Philippines.<sup>88</sup>

Such transmutation was, however, not automatic as to afford *Atty. Lopez* of due process of law. Nonetheless, his defense was not given

---

<sup>84</sup> A.C. No. 7986, July 27, 2021.

<sup>85</sup> *Id.* at 14. This pinpoint citation refers to the copy of this decision uploaded to the Supreme Court Website.

<sup>86</sup> *Id.* at 2–5.

<sup>87</sup> *Id.* at 5–9.

<sup>88</sup> *Id.* at 13–19.

credence by the Court because the lack of notice he averred was not supported by the records.<sup>89</sup> Further, the Court took notice of the fact that Lopez repeatedly failed to comply with the directives of the Court. As such, given the gravity of the offenses committed by Lopez in California, coupled with his refusal to comply with court orders through the years, the Court ruled that Lopez had violated the CPR and should therefore be disbarred.<sup>90</sup>

## V. INTEGRITY AND PROPRIETY FOR JUDGES

### A. *Office of the Court Administrator v. Atillo*<sup>91</sup>

The expectation on integrity and propriety in everyday life extends not only to lawyers, but more so to judges. In *Office of the Court Administrator v. Atillo*, the Court highlighted that judges are the “visible personification[s] of law and justice,”<sup>92</sup> and thus, they are held to higher expectations on proper conduct. This higher standard for propriety of conduct extends even to dealings in social media.

In this case, the Office of the Court Administrator (OCA) received copies of pictures allegedly used as profile and cover photos of Judge Atillo in his Facebook profile. The photos show him half-dressed, revealing his tattoos in his torso. In his comment, Judge Atillo explained that his Facebook account was hacked. Initially, the photos were meant to be shown only to his Facebook friends, but the privacy setting was changed to public when his account was hacked. He also argued that the evidence against him are inadmissible under the exclusionary rule.<sup>93</sup>

The OCA found Judge Atillo guilty of violating Sections 1<sup>94</sup> and 2<sup>95</sup>, Canon 4 of the New Code of Judicial Conduct. The OCA also found him

---

<sup>89</sup> *Id.* at 14.

<sup>90</sup> *Id.* at 18–20.

<sup>91</sup> [Hereinafter “*Atillo*”], A. M. No. RTJ-21-019, Sep. 29, 2021

<sup>92</sup> *Id.* at 8. This pinpoint citation refers to the copy of the resolution uploaded in the Supreme Court website.

<sup>93</sup> *Id.* at 1–2.

<sup>94</sup> Section 1, Canon 4 of the New Code of Judicial Conduct provides that “[j]udges shall avoid impropriety and the appearance of impropriety in all of their activities.”

<sup>95</sup> Section 2, Canon 4 of the New Code of Judicial Conduct provides that “[a]s a subject of constant public scrutiny, judges must accept personal restrictions that might be viewed as burdensome by the ordinary citizen and should do so freely and willingly. In particular, judges shall conduct themselves in a way that is consistent with the dignity of the judicial office.”



guilty of violating OCA Circular No. 173-2017, or the circular dealing with the proper use of social media. Further, the OCA found him guilty of doing acts constituting Conduct Unbecoming of a Judge. With all of these, the OCA recommended that Judge Atillo be meted the penalty of reprimand.<sup>96</sup>

The Court agreed with the OCA's findings but modified the penalty to an admonishment. The Court emphasized the "exacting standards" that is expected of a judge under Canons 2 and 4 of the New Code of Judicial Conduct. The Court clarified that it is not the fact that the Judge has tattoos on his body that the Court finds improper. Instead, the impropriety is with the Judge's act of posting the pictures on social media and thereby placing himself as an "object of the public's criticism and ridicule." The Court acknowledged that Judge Atillo's act would have seemed harmless and inoffensive if it were done by an ordinary member of the public, but it stressed that "judges are held to higher standards of conduct and thus must accordingly comport themselves."<sup>97</sup>

As regards his defense on inadmissibility evidence based on the exclusionary rule, the Court reiterated the principle that the exclusionary rule is a restraint against the State. In this case, an anonymous private individual sent the copies of pictures to the OCA. Thus, the exclusionary rule does not apply. More importantly, Judge Atillo cannot easily evade administrative liability by relying on the privacy settings he set on Facebook.<sup>98</sup> As the Court has previously explained exhaustively *Vivares v. STC*,<sup>99</sup> there are risks involved in the use of social media, and one's postings cannot easily be deemed to be truly private.

Further, the Court ruled that Judge Atillo failed to adhere to the standards set forth by OCA Circular No. 173-2017, which primarily sets forth that members of the Judiciary should be "cautious" and "circumspect" in their postings and interactions in social media. The Court once again reminded the members of the bench that they need to be conscious of their social media postings and interactions, even those outside of the formal judicial functions, because any social media content affects not only the general public perception on the judge as a person, but on the judiciary as an institution, as well.<sup>100</sup>

---

<sup>96</sup> *Atillo*, *supra* note 91, at 3–4.

<sup>97</sup> *Id.* at 6, 8.

<sup>98</sup> *Id.* at 6–8.

<sup>99</sup> G.R. No. 202666, 737 SCRA 92, Sept. 29, 2014.

<sup>100</sup> *Atillo*, *supra* note 91, at 8.

Given all these, the Court admonished Judge Atillo, with a stern warning that repetition shall be punished more severely.<sup>101</sup>

- o0o -

---

<sup>101</sup> *Id.* at 9.

COLLEGE OF LAW  
UNIVERSITY OF THE PHILIPPINES

FACULTY

EDGARDO CARLO L. VISTAN II, B.S., LL.B., LL.M., *Dean & Assistant Professor of Law*  
SOLOMON F. LUMBA, B.S., LL.B., *Associate Dean & Assistant Professor of Law*

PROFESSORS OF LAW

ELIZABETH H. AGUILING-PANGALANGAN, B.A., LL.B., LL.M.  
JAY L. BATONGBACAL, B.A., LL.M., M.M.M., J.S.D.  
DANILO L. CONCEPCION, B.S.A.E., LL.B., LL.M.  
DANTE B. GATMAYTAN, B.S., LL.B., M.S.E.L., LL.M.  
RAUL C. PANGALANGAN, B.A., LL.B., LL.M., J.S.D.

ASSOCIATE PROFESSORS OF LAW

EVELYN (LEO) D. BATTAD, B.S., B.A., LL.B., LL.M.  
ROMMEL J. CASIS, B.A., LL.B., LL.M.  
FIDES T. CORDERO-TAN, B.S., LL.B.  
JOSE JESUS M. DISINI, JR., B.S., LL.B., LL.M.  
MA. GISELLA N. DIZON-REYES, B.A., LL.B., M.P.A.  
VIRGILIO S. JACINTO, A.B., LL.B., LL.M.  
HECTOR DANNY D. UY, B.A., LL.B., M.N.S.A.

ASSISTANT PROFESSORS OF LAW

EMERSON S. BAÑEZ, B.A., LL.B., LL.M.  
JACQUELINE JOYCE F. ESPENILLA, B.A., J.D., LL.M.  
RYAN P. OLIVA, B.A., J.D.  
ANDRE C. PALACIOS, B.S., LL.B., LL.M.  
RENE B. GOROSPE, A.B., LL.B.  
MICHELLE B. SAN BUENAVENTURA-DY, B.A., LL.B., *College Secretary*  
THEODORE O. TE, B.A., LL.B., LL.M.  
MICHAEL T. TIU, JR., B.A., J.D., LL.M.  
NICHOLAS FELIX L. TY, B.S.B.E., LL.B.

LECTURERS & PROFESSORIAL LECTURERS

ANNA MARIA D. ABAD, B.A., LL.B.  
EDUARDO JUAN F. ABELLA, B.S.C., LL.B.  
EDWIN R. ABELLA, B.S.B.A., LL.B., LL.M.  
ZANDY MELITO D. ABELLERA, B.A., LL.B.  
MICHEL KRISTIAN R. ABLAN II, B.S., LL.B., POST-GRAD IN ARTS, M.P.F., M.A. NSA  
ABRAHAM REY M. ACOSTA, B.S., LL.B.  
PACIFICCO A. AGABIN, LL.B., B.S.J., LL.M., J.S.D.  
OSWALDO D. AGCAOLI, A.B., LL.B.  
ALBERTO C. AGRA, A.B., LL.B.  
RAMON MANOLO A. ALCASABAS, B.S., J.D., LL.M.  
RAMON QUINTIN CLAUDIO C. ALLADO, B.S., LL.B.  
DARWIN P. ANGELES, B.S., J.D.  
JOSEPH EMMANUEL L. ANGELES, B.S.B.A., LL.B., LL.M., PH.D.  
JESUSA LORETO ARELLANO-AGUDA, B.S., LL.B., LL.M.  
AMABELLE C. ASUNCION, B.A., LL.B., LL.M.  
EMERSON B. AQUINDE, B.S., LL.B.  
AUGUSTO JOSEY. ARREZA, B.A., LL.B.  
FRANCIS ALVIN V. ASILO, B.S.B.E., LL.B.  
ANNA ISABEL G. AURELLANO, B.A., LL.B., LL.M.  
ARTHUR P. AUTEA, B.A., LL.B.  
VICTORIA A. AVENA, B.F.A., LL.B., LL.M.  
HERMINTO C. BAGRO III, B.A., J.D.  
RAYMOND MARYIC C. BACULAT, B.A., J.D., LL.M.  
BALADAD, BENEDICTA D., B.S., LL.B., LL.M.  
LORYBETH R. BALDIASS-SERRANO, B.S. B.A.A., J.D.  
RYAN HARTZELL C. BALISAGAN, B.A., J.D., M.P.A., LL.M.  
CHARADINE S. BANDON, B.A., LL.B., LL.M.  
CARLOS G. BANQUED, B.A., LL.B., LL.M.  
LAI-LYNN ANGELICA B. BARCENAS, B.S.C., LL.B., M.A.  
PETER DONNELLY A. BAROT, A.B., LL.B., LL.M.  
CHRYSILLA CARISSA P. BAUTISTA, B.A., LL.B., LL.M.  
ROSA MARIA J. BAUTISTA, B.A., LL.B., LL.M.  
MARIANNE BELTRAN-ANGELES, B.S., LL.B., M.S.  
MARIA EMILYNDA JEDDAHLYN PIA V. BENOSA, B.A., J.D., LL.M.  
CRISTINA REGINA N. BONOAN, B.S., LL.B., LL.M.  
NEIL ANTHONY S. BORA, A.B., J.D., LL.M.  
CARLO R. RAFAEL C. BOLLEROMO, B.S., J.D.  
ROENTGEN F. BRONCE, B.A., J.D.  
ADRIAN FRANCIS S. BUSTOS, B.S.B.A., J.D.  
PURSIMO S. BUYO, A.B., LL.B.  
ALFREDO R. CABEZA, B.A., LL.B.  
MARISSA O. CABREROS, B.S., J.D., M.P.M.  
DAN P. CALICA, B.A., LL.B.  
JEROME D. CANLAS, B.A., J.D., LL.M.  
JAIME FORTUNATO A. CARINGAL, A.B., LL.B., LL.M.  
SALVADOR T. CARLOTA, B.S., LL.B., LL.M.  
ARNEL PACIANO D. CASANOVA, B.A., LL.B. MPA  
RACHEL ANN M. CASTRO, B.A., J.D.  
MARC TITUS D. CEBREROS, B.S., J.D., LL.M.  
CELESTE RUTH L. CEMBRANO-MALLARI, B.A., LL.B., LL.M.  
MARIO C. CERTEZ, JR., B.A., LL.B., LL.M.  
GERARD L. CHAN, B.S., LL.B., LL.M.  
GIAN ANGELO E. CHUA, B.S.B.A., J.D.  
JUAN PAOLO E. COLET, B.A., LL.B.  
MA. GABRIELA R. CONCEPCION, B.A., LL.B.  
SANDRA MARIE O. CORONEL, B.A., LL.B.  
DEMETRIO D. CUSTODIO, JR., B.A., LL.B., M.B.A.  
FLORIAN KIM P. CAYR, B.S., LL.B., J.D.  
MICHAEL CHRISTOPHER C. CASTRO, B.S., J.D.  
ALAYA M. DE LEON, B.A., LL.B., LL.M.  
HECTOR M. DE LEON, JR., LL.B., LL.M.  
SENEN AGUSTIN S. DE SANTOS, B.A., LL.B.  
ARNOLD F. DE VERA, B.S., LL.B., LL.M.  
GWEN G. DE VERA, A.B., LL.B., LL.M.  
GABRIEL A. DE LA CRUZ, LL.B.  
JOCEL ISIDRO S. DILAG, B.S., J.D.  
NITO T. DIVINA, B.A., LL.B.  
JENNY JEAN B. DOMINO, A.B., J.D., LL.M.  
ANZEN P. DY, B.A., LL.B.  
VICTOR Y. ELEAZAR, B.A., LL.B., LL.M.  
KIM BOYSIE A. ENAGE, B.S., J.D.  
AISA V. ENCARNACION, B.S., LL.B.  
EDUARDO C. ESCANO, A.B., LL.B.  
VILVA V. ESCUETA-DIAVIT, B.S.B.A., LL.B.  
RAMON S. ESCUERRA, B.A., LL.B.  
ABDIEL DAN ELIJAH S. FAJARDO, B.S., LL.B.  
LUIS JOSE P. FERRER, B.S.B.A.A., LL.B.

ALEX FERDINAND S. FIDER, B.A., LL.B., LL.M.  
ROBERTO L. FIGUEROA, B.A., LL.B., LL.M.  
EMMA C. FRANCISCO, A.B., LL.B.  
DONNAZ. GASCONIA, B.A., LL.B., LL.M.  
MIA G. GENTUGAYA, B.A., LL.B.  
REGINA P. GERALDEZ, B.A., LL.B., LL.M.  
RUSSEL STANLEY G. GERONIMO, B.S., J.D.  
CARLO MIGUEL ROMEO S. GO, B.S.B.E., J.D.  
MARIE MICHELLE B. GO, B.A., J.D., LL.M.  
RENO R. GONZALES JR., B.A., LL.B.  
CIELO MARJORIE A. GONO, B.A., J.D.  
RENE B. GOROSPE, A.B., LL.B.  
TERESA IRA MARIS F. GUANZON, B.S., J.D., M.A. ECON  
CECILIA THERESE T. GUIAO, B.A., J.D., LL.M., M. TRI SECTOR COLL.  
CELENT KRISTINE G. GUINTO, B.S., J.D., LL.M.  
JAMES DENNIS C. GUMPAL, B.S., LL.B., M.D., LL.M.  
RICARDO JESUS E. GUTIERREZ, B.A., J.D. T  
TERESTA J. HERBOSA, B.A., LL.B., MCL  
CHARLES DAVID A. ICASIANO, B.A., J.D., M.P.F.  
OSWALD P. IMBAT, B.A., J.D.  
ANTHONY RAPHAEL V. JACOBA, B.A., J.D.  
CARLOS S. HERNANDEZ JR., B.S., J.D.  
CONCEPCION L. JARDELEZA, B.A., LL.B.  
FRANCIS H. JARDELEZA, B.A., LL.B., LL.M.  
MARIA CARMEN L. JARDELEZA, B.A., J.D., LL.M.  
ILDEFONSO R. JIMENEZ, B.S., LL.B.  
MA. CECILIA B. JIMENEZ-RADA, B.S., J.D.  
MARK DENNIS Y.C. JOVEN, B.S.B.A., LL.B., LL.M.  
THEODORE JOSEPH M. JUMAMIL, B.S., J.D.  
ARMINA DIELE R. KAPUNAN, B.A., J.D.  
KESTERSON T. KUA, B.S., J.D.  
ANTONIO GABRIEL M. LA VINA, A.B., LL.B., LL.M., SJD/JO  
BLANCA PERALTA B. LABAY, B.S., J.D.  
EDUARDO A. LABITAG, A.B., LL.B.  
MARGO GREGORIO P. LAJAN, B.S., J.D.  
CHRISTOPHER JOHN P. LAO, B.A., J.D.  
MA. TANYA KARINA A. LAT, B.S., LL.B., LL.M.  
JOSE M. LAYUG JR., B.S., LL.B., LL.M.  
MA. CAROLINA T. LEGARDA, B.A., LL.B.  
LUISITO V. LIBAN, B.S.B.A., LL.B.  
AMANDO VIRGIL D. LIGUTAN, A.B., J.D.  
DYAN DANIKA G. MACAPAGAL, B.S., LL.B., J.D.  
DANIEL D. LISING, B.S., M.S., M.D., J.D., LL.M.  
GLENDA T. LITONG, B.A., LL.B., LL.M.  
MARWIL N. LLASOS, B.A., LL.B., LL.M.  
VICTORIA V. LOANZON, A.B., M.A., LL.B.  
JOSE MARTIN A. LOON, B.A., J.D., LL.M.  
MARIANNE P. LOZADA-MARQUEZ, B.S., LL.B.  
DINA D. LUGENARIG, B.A., LL.B.  
MICHAEL T. MACAPAGAL, B.S., J.D., LL.M.  
MARLO M. MAGDOZA-MALAGAR, B.A., LL.B., LL.M.  
LEO B. MALAGAR, B.A., LL.B., LL.M.  
RYAN ANTHONY S. MALIT, B.S., J.D.  
ELSON B. MANAHAN, B.S.C.S., J.D.  
RENATO B. MANALOTO, B.A., LL.B., M.A.  
DONNA PATRICIA C. MANLANGIT, B.A., J.D., M.A.  
MONTICA JOY M. MANGALAO, B.S., J.D.  
JOSE MARIA L. MARELLA, B.S.E., J.D.  
MARK ANTHONY B. MARQUEZ, B.A., LL.B.  
CRISLEDA S. MARTIN-FUNELAS, B.A., LL.B.  
SOLEDDA D. MAWIS, A.B., LL.B.  
JOAN THERESE C. MEDALLA, A.B., J.D.  
CRENSON T. MENESSES I, B.S.B.A.A., LL.B., LL.M.  
CARLO ROBERT M. MENDOZA, B.S., J.D.  
MARTIN IGNACIO D. MIJARES, B.A.E., B.S.C., LL.B.  
ALFREDO B. MOLO III, B.A., LL.B., LL.M.  
RAFAEL A. MORALES, A.B., LL.B., LL.M.  
ROWENA EVELYN D. MORALES, A.B., LL.B.  
ALBERTO T. MUYOT, JR., A.B., LL.B., LL.M.  
CHRISTOPHER LOUIE D. Ocampo, B.A., J.D., LL.M.  
LAWRENCE GERARD T. ORTIZ, B.S., J.D.  
MARIA CRISTINA C. ORTUA-ANG, B.S., J.D., LL.M.  
MARK XAVIER D. OYALES, B.S., J.D.  
FROILYN D. PAGAYATAN, B.A., LL.B.  
FACUNDO O. PALAFOX V. B.A., LL.B.  
JOSE MIGUEL D.C. PALARCA, B.A., LL.B.  
RENATO M. PAMBID, B.A., LL.B.  
RAPHAEL LORENZO M.A. PANGALANGAN, B.A., M.S. IHR, J.D., LL.M.  
RENE CHESTER A. PANGAN, B.S., LL.B.  
DIVINA GRACIA E. PEDRON, A.B., LL.B.  
MA. PILAR M. PILARES-GUTIERREZ, B.S., LL.B.

CARLA S. PINGUL, B.A., J.D.  
MARIA CELIA H. POBLADOR, B.A., J.D., LL.M.  
RONALD D. POLICARPIO, B.S., LL.B.  
PATRICIA ANN T. PRODIGALDAD, B.S., LL.B., LL.M.  
ROBERTO RAFAEL J. PULIDO, B.A., J.D., LL.M.  
GRACE P. QUEVEDO-PANAGSAGAN, A.B., LL.B.  
ELITA JOY P. QUICHO, B.S., LL.B., LL.M.  
PAUL DENNIS A. QUINTERO, B.S.B.A.A., LL.B.  
MARIE CECILE R. QUINTOS, B.A., LL.B.  
BAYAN JOSEPH A. QUINONES, B.S., LL.B.  
ELMER T. RABUYA, B.A., LL.B.  
JOEL P. RAQUEDAN, B.S., LL.B.  
JOHN NOAH M. RED, A.B., J.D.  
JANNET C. REGALADO, B.A., LL.B.  
EFRENT R. RESURRECCION II, B.S., LL.B.  
GILBERT RAYMUND T. REYES, B.S., LL.B.  
GRACIELLO TIMOTHY D. REYES, B.A., J.D., LL.M.  
OLIVER XAVIER A. REYES, B.A., LL.B.  
ROCKY D.L. REYES, B.A., LL.B., LL.M.  
GERELY C. RICO-CRUZ, B.A., LL.B.  
JOSEPHINE P. RIMA-SANTIAGO, B.S., LL.B., LL.M.  
JEAN FRANCOIS D. RIVERA III, B.S.B.A., LL.B., POST GRAD CERT IN TAXATION LAW, POST GRAD DIPLOMA IN CORPORATE SECURITIES LAW  
JOHN BOOMSKI S. RODOLFO, B.A., LL.B.  
ANA MARGARITA A. RODRIGUEZ, B.A., J.D.  
CHARLTON JULES F. ROMERO, A.B., LL.B., M.B.A.  
MA. ISABEL P. ROMERO, B.S.B.A., LL.B.  
MARY GRACE ANNE S. ROSALES-TO. DOMINGO, B.A., J.D.  
MERWYN PAUL D. ROSTRATA, B.S.B.E., LL.B., M.S. RDP  
RODERICK RONALD C. SALAZAR III, B.A., LL.B.  
SERAFIN U. SALVADOR JR., A.B., LL.B., GRAD TAX PROGRAM, M.B.A.  
TRAN QUI L. SALVADOR III, J.D., LL.M.  
JOSE S. SAMSON III, A.B., LL.B., M.B.A., LL.M., D.C.L.  
BRYAN A. SAN JUAN, B.A., J.D., LL.M.  
TEODILO ANTONIO G. SAN JUAN, JR., B.A., LL.B.  
DIONNE MARIE M. SANCHEZ, B.S.B.A.A., LL.B.  
ARNO V. SANIDAD, A.B., LL.B.  
CRISLEDA S. SANTIAGO, B.S., J.D.  
MARIA VICTORIA D. SARMIENTO, B.A., LL.B., M. COMP. LAW  
SIMONETTE E. SIBAL-LOTO, B.A., LL.B.  
NEIL SIMON S. SILVA, B.A., LL.B.  
MARIA FILOMENA D. SINGH, B.A., J.D., LL.M.  
FRANCIS V. SOBREVINAS, B.S., LL.B., LL.M.  
RONALDO O. SOLIS, B.S.B.A., LL.B.  
PAOLO EMMANUEL S. TAMASE, B.S.B.E., J.D.  
MARY ROSE S. TAN, B.A., LL.B., LL.M.  
FINA BERNADETTE D. TANTUICO, B.A., LL.B.  
JOSEPHINE NANCY L. TAPIA, B.S., LL.B., LL.M.  
NADAINÉ P. TONGGO, B.S.B.A.A., J.D.  
ANITA PATRICIA R. TOBIAS, B.A., J.D., LL.M.  
RUBY ROSSELLE L. TUGADE, A.B., J.D., LL.M.  
CRISOSTOMO A. URIBE, B.A., LL.B.  
ARNELL P. UYCHOCO, B.S.E., LL.B.  
EDUARDO VICTOR J. VALDEZ, B.A., LL.B.  
KARLA REGINA D. VALERA, B.S., J.D., LL.M.  
MARIA PATRICIA S. VALENA, B.A., J.D.  
FLORELIZA C. VARGAS-TRINIDAD, B.A., LL.B.  
RAUL T. VASQUEZ, A.B., LL.B.  
CECILIO ALEJANDRO C. VILLANUEVA, B.A., LL.M., M.N.S.A.  
SUSAN D. VILLANUEVA, A.B., LL.B., LL.M.  
VIFEROY N. VILLAR, B.A., J.D.  
ERNESTINE GARMEN JOY D. VILREAL-FERNANDO, A.B., LL.B.  
LHOVERETTE JEFFREY P. VILLORON, B.S., J.D.  
VINAS, LAARNI VICTORIA, B.A., LL.B.  
VIRGINIA B. VIRAY, B.S., LL.B., M.B.A.  
YVETTE T. YANEZA-ESPORLAS, B.S.B.A.A., J.D.  
LEE EDSON P. YARCIA, INTARMED, J.D.