
REPUBLIC OF THE PHILIPPINES

OFFICE OF THE OMBUDSMAN
Agham Road, Diliman, Quezon City

[NAME OF COMPLAINANT],

Complainant,

-versus-

[NAME/S OF RESPONDENT/S],

(Officials of , MIAA, DOTr, and other responsible public officers),
Respondents.

COMPLAINT-AFFIDAVIT

(For: Violation of RA 3019, Grave Misconduct, Gross Negligence, and Reckless Imprudence)

I, **[Name of Complainant]**, of legal age, Filipino, and a resident of [address], after having been duly sworn in accordance with law, hereby depose and state:

I. PERSONAL CIRCUMSTANCES

1. I am the complainant in this case.
2. I am filing this Complaint-Affidavit against the respondents for their criminal and administrative liability arising from the ceiling collapse incident at on April 3, 2026.

II. RESPONDENTS

3. Respondents are public officials and/or employees who, at the time of the incident, were responsible for:
 - Maintenance and safety of airport facilities
 - Oversight and regulation of airport operations
 - Approval and supervision of infrastructure works
4. Respondents include, but are not limited to:
 - Engineering and maintenance officers
 - Safety and inspection কর্মকর্তা
 - Officials of MIAA and DOTr
 - Public officers exercising oversight over

III. STATEMENT OF FACTS

5. On **April 3, 2026 (Good Friday)**, a portion of the ceiling at collapsed at approximately 10:43 A.M.
6. The incident resulted in injuries to several individuals, including myself.
7. The collapse occurred in a public area under the control, supervision, and maintenance of respondents.
8. The incident demonstrates a **failure of structural integrity**, which could only have resulted from:
 - Negligent maintenance
 - Failure to inspect
 - Use of substandard materials
 - Non-compliance with safety standards
9. Respondents failed to exercise the diligence required of their positions.

IV. CAUSES OF ACTION

A. CRIMINAL LIABILITY — RA 3019 (ANTI-GRAFT AND CORRUPT PRACTICES ACT)

10. Under **Section 3(e) of RA 3019**, it is unlawful for a public officer to:

“Cause undue injury to any party, including the Government, or give any private party unwarranted benefits through manifest partiality, evident bad faith, or gross inexcusable negligence.”

11. Respondents, through **gross inexcusable negligence**, caused undue injury to the victims.

12. If proven, respondents may have:

- Approved defective works
- Allowed unsafe conditions
- Failed to enforce safety regulations

B. CRIMINAL LIABILITY — RECKLESS IMPRUDENCE (RPC ARTICLE 365)

13. Respondents' acts and omissions constitute **reckless imprudence resulting in physical injuries**, as they failed to take necessary precautions despite their duty.

C. ADMINISTRATIVE LIABILITY

14. Respondents are administratively liable for:

1. Gross Negligence

Failure to perform duties with even slight care.

2. Grave Misconduct

If corruption or willful disregard of rules is proven.

3. Conduct Prejudicial to the Best Interest of the Service

V. LEGAL BASIS

15. Under the **1987 Constitution, Article XI**, public officers are accountable to the people.

16. Under **RA 6770 (Ombudsman Act of 1989)**, the Ombudsman has authority to investigate and prosecute public officials.

17. Under the **Revised Penal Code (Article 365)**, negligent acts causing injury are punishable.

18. Jurisprudence:

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→ Defines gross negligence as lack of even slight care

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→ Public officers may be administratively liable for negligence

VI. EVIDENCE

19. I am submitting the following evidence:

- Medical records and receipts
- Photographs/videos of the incident
- News reports
- Witness affidavits
- Official investigation reports (when available)

VII. PRAYER

WHEREFORE, premises considered, it is respectfully prayed that:

1. Respondents be **criminally charged** for:
 - Violation of RA 3019
 - Reckless Imprudence Resulting in Physical Injuries
2. Respondents be held **administratively liable** and penalized accordingly;

3. Preventive suspension be imposed, if warranted;
4. Such other reliefs as may be just and equitable be granted.

VIII. VERIFICATION AND CERTIFICATION

I hereby certify that:

- I have read this Complaint-Affidavit;
- The allegations are true and correct based on my personal knowledge and authentic records;
- I have not filed any other complaint involving the same issues in any court or tribunal.

[Signature of Complainant]

Affiant

SUBSCRIBED AND SWORN before me this ___ day of _____, 2026.

STRATEGIC NOTES

1. CRITICAL IMPROVEMENT (VERY IMPORTANT)

To make this **strong enough to survive dismissal**, you should:

- 👉 **Name specific officials** (not just positions)
- 👉 Attach **engineering findings or COA reports** if available

Without these, Ombudsman may dismiss for:

- “Lack of probable cause”
 - “General allegations”
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2. WHEN RA 3019 IS WEAK

If no corruption evidence:

- Focus on **gross negligence + administrative liability**
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3. BEST STRATEGY

File:

- Ombudsman case (pressure + accountability)
 - Civil case (compensation)
 - Criminal complaint (deterrence)
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