

Republic of the Philippines
OFFICE OF THE OMBUDSMAN
Agham Road, Diliman, Quezon City, Metro Manila, NCR, Philippines, 1101

PRIVATE CITIZEN [REDACTED]
AND ON BEHALF OF ALL FILIPINOS,
Complainants.

-versus-

DPWH SECRETARY MANUEL M. BONOAN,
SENIOR USEC EMIL K. SADAIN,
USEC EUGENIO R. PIPO, JR.,
USEC ADOR G. CANLAS,
USEC MARICHU A. PALAFOX,
USEC. ERIC A. MAYAPANA,
USEC MARIA CATALINA E. CABRAL,
USEC CARLOS G. MUTUC,
USEC ANNE SHARLYNE G. LAPUZ,
ASEC LORETA M. MALALUAN,
ASEC NORIE D. BUENO,
ASEC MICHAEL S. VILLAFRANCA,
ASEC MEDMIER G. MALIG,
ASEC CONSTANCE A. LLANES, JR.,
ASEC JOY M. MANGINSAY,
AND OTHER TOP OFFICIALS UNDER PARAGRAPH 1
AND THE TOP 15 CONTRACTORS NAMED BY BBM
Respondents.

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COMPLAINT

I, [REDACTED], and on behalf of the entire 116 million Filipinos,
COMPLAINANTS, respectfully state:

PREFATORY STATEMENT

*“It is the **right and duty** of a citizen to make a complaint of any misconduct on the part of public officials, which **comes to his notice**, to those charged with supervision over them.”¹ [emphasis added]*

¹ *Sazon vs. People*, G.R. No. 120715, March 29, 1996 citing *Daez v. Court of Appeals*

“Section 13. Mandate. — **The Ombudsman and his Deputies, as protectors of the people, shall act promptly on complaints filed in any form or manner against officers or employees of the Government, or of any subdivision, agency or instrumentality thereof, including government-owned or controlled corporations, and enforce their administrative, civil and criminal liability in every case where the evidence warrants in order to promote efficient service by the Government to the people.**” – R. A. 6770

1. This *Ombudsman Complaint* implead the following respondent DPWH officials taken from their website:

<https://www.dpwh.gov.ph/dpwh/directory/index>

DPWH Directory Index

Key Officials

Name	Position	Email
Manuel M. Bonoan	Secretary	bonoan.manuel@dpwh.gov.ph
Emil K. Sadain	Senior Undersecretary	sadainekmail@yahoo.com
Eugenio R. Pipo, Jr.	Undersecretary for Regional Operations in Luzon	pipo.eugenio@dpwh.gov.ph
Ador G. Canlas	Undersecretary for Regional Operations in Visayas and Mindanao	canlas.ador@dpwh.gov.ph
Marichu A. Palafox	Undersecretary for Support Services	palafox.marichu@dpwh.gov.ph
Eric A. Ayapana	Undersecretary for Technical Services, NBCDO and External Convergence Projects	ayapana.eric@dpwh.gov.ph

Name	Position	Email
<u>Maria Catalina E. Cabral</u>	Undersecretary for Planning, Public-Private Partnership, and Information Management Services	<u>cabral.ma_catalina@dpwh.gov.ph</u>
<u>Carlos G. Mutuc</u>	Undersecretary for Special Concerns and Chief of Staff of the Office of the Secretary	<u>mutuc.carlos@dpwh.gov.ph</u>
<u>Anne Sharlyne G. Lapuz</u>	Undersecretary for Legal Services	<u>lapuz.anne_sharlyne@dpwh.gov.ph</u>
<u>Loreta M. Malaluan</u>	Assistant Secretary for Regional Operations in Luzon	<u>malaluan.loreta@dpwh.gov.ph</u>
<u>Nerie D. Bueno</u>	Assistant Secretary for Regional Operations in Visayas and Mindanao	<u>bueno.nerie@dpwh.gov.ph</u>
<u>Michael S. Villafranca</u>	Assistant Secretary for Support Services	<u>villafranca.michael@dpwh.gov.ph</u>
<u>Medmier G. Malig</u>	Assistant Secretary for Technical Services, NBCDO and External Convergence Projects	<u>malig.medmier@dpwh.gov.ph</u>
<u>Constante A. Llanes, Jr.</u>	Assistant Secretary for Planning Service and Legislative Liaison Office	<u>llanes.constante@dpwh.gov.ph</u>
<u>Joy M. Manginsay</u>	Assistant Secretary for Special Concerns	<u>manginsay.joy@dpwh.gov.ph</u>

Bureaus (Central Office - Manila)

Name	Position, Bureau	Email
Allan S. Borromeo	Director, Bureau of Construction	borromeo.allan@dpwh.gov.ph
Blesilda S. Ramos	Director, Bureau of Design	ramos.blesilda@dpwh.gov.ph
Toribio Noel L. Ilao	Director, Bureau of Equipment	ilao.toribio_noel@dpwh.gov.ph
Gene Ryan A. Altea	Director, Bureau of Maintenance	altea.gene_ryan@dpwh.gov.ph
Reynaldo P. Faustino	Director, Bureau of Quality and Safety	faustino.reynaldo@dpwh.gov.ph
Juliana D. Vergara	Director, Bureau of Research and Standards	vergara.juliana@dpwh.gov.ph

Services (Central Office - Manila)

Name	Position, Department	Email
Genevieve E. Cuaresma	Director, Finance Service	cuaresma.genevieve@dpwh.gov.ph
Vanessa G. Villanueva	Director, Human Resource and Administrative Service	villanueva.vanessa@dpwh.gov.ph
Rhalf B. Cawaling	Director, Information Management Service	cawaling.rhalf@dpwh.gov.ph
Luz M. Dela Rosa	Director, Internal Audit Service	delarosa.luz@dpwh.gov.ph
Gliricidia C. Tumaliuan-Ali	Director, Legal Service	tumaliuan.gliricidia@dpwh.gov.ph
Pelita V. Galvez	Director, Public-Private Partnership Service	galvez.pelita@dpwh.gov.ph
Ma. Victoria S. Gregorio	Director, Procurement Service	gregorio.ma_victoria@dpwh.gov.ph
Alex G. Bote	Director, Planning Service	bote.alex@dpwh.gov.ph

Name	Position, Department	Email
Randy R. Del Rosario	Director, Stakeholders Relations Service	delrosario.randy@dpwh.gov.ph

Unified Project Management Offices (UPMO)

Name	Position, Department	Email
Rodrigo I. delos Reyes	Project Director, Bridges Management Cluster	delosreyes.rodrigo@dpwh.gov.ph
Soledad R. Florencio	Project Director, Buildings and Special Projects Management Cluster	florencio.soledad@dpwh.gov.ph
Ramon A. Arriola III	Project Director, Flood Control Management Cluster	arriola.ramon@dpwh.gov.ph
Benjamin A. Bautista	Project Director, Roads Management Cluster I (Bilateral)	bautista.benjamin@dpwh.gov.ph
Teresita V. Bauzon	Project Director, Roads Management Cluster II (Multilateral)	bauzon.teresita@dpwh.gov.ph
Eileen I. Diya	OIC-Project Director, Regional Project Management Office-BARMM	diya.eileen@dpwh.gov.ph

Regional Directory

Region	Location	Regional Director	
NCR	NCR Compound, 2nd Street, Port Area, Manila, Philippines	RD GERARD P. OPULENCIA (OIC)	Contact No(s).: (02) 5304-3700 Fax No.: (02) 5304-3910 Email: opulencia.gerard@dpwh.gov.ph
CAR	Cordillera Administrative Regional Office, Engineer's	RD KHADAFFY D. TANGGOL	Contact No(s).: (074) 444-3149 Fax No.: (074) 444-8838/(074) 6460 Email: tanggol.khadaffy@dpwh.gov.ph

Region	Location	Regional Director	
	Hill, Baguio City, Philippines		
Region I	Regional Office I, Aguila Road, Sevilla, San Fernando City, La Union, Philippines	RD RONNEL M. TAN	Contact No(s).: (072) 242-9333 Fax No.: (072) 242-9372 Email: tan.ronnel@dpwh.gov.ph
Region II	Regional Office II, Dalan na Pavvurulun, Regional Government Center, Carig Sur, Tuguegarao City, Cagayan, Philippines	RD MATHIAS L. MALENAB (OIC)	Contact No(s).: (02) 5302-6002 5302-6003 Fax No.: (078) 844-9524 Email: malenab.mathias@dpwh.gov.ph
Region III	Regional Office III, Sindalan, San Fernando City, Pampanga, Philippines	RD ROSELLER A. TOLENTINO	Contact No(s).: (045) 649-4142 Fax No.: Email: tolentino.roseller@dpwh.gov.ph
Region IV-A	Regional Office IV-A, Canlubang Interchange, Brgy. Mayapa, City of Calamba, Laguna, Philippines	RD JOVEL G. MENDOZA	Contact No(s).: (02) 3481-0202 Fax No.: (02) 3927-3276 Email: mendoza.jovel@dpwh.gov.ph
Region IV-B	Regional Office IV-B, Brgy. Pinyahan, EDSA, Diliman,	RD GERALD A. PACANAN	Contact No(s).: (02) 5318-0303 5318-0304 Fax No.: Email: pacanan.gerald@dpwh.gov.ph

Region	Location	Regional Director	
	Quezon City, Philippines		
Region V	Regional Office V, Old Airport Road, Brgy. 40- Cruzada, Legazpi City, Philippines	RD VIRGILIO C. EDUARTE	Contact No(s).: (052) 482-0395 Fax No.: (052) 482-0395 Email: eduarte.virgilio@dpwh.gov.ph
Region VI	Regional Office VI, Fort San Pedro, Iloilo City, Philippines	RD JOEL F. LIMPENGCO (OIC)	Contact No(s).: (033) 339-7201 Fax No.: (033) 339-7201 Email: limpengco.joel@dpwh.gov.ph
NIR	DPWH Bureau of Equipment 4th Area Equipment Service, Barangay Bio- os, Amlan, Negros Oriental	RD DENISE MARIA M. AYAG	Contact No(s).: +632- Fax No.: Email: ayag.denise_maria@dpwh.gov.ph
Region VII	Regional Office VII, South Road Properties, Barangay San Nicolas, Cebu City, Philippines	RD DANILO J. VILLA, JR	Contact No(s).: (032)-411-6714 411-6715 Fax No.: Email: villa.danilo_jr@dpwh.gov.ph
Region VIII	Regional Office VIII, Government Center, Baras, Palo, Leyte, Philippines	RD EDGAR B. TABACON	Contact No(s).: (053) 323-1001 Fax No.: Email: tabacon.edgar@dpwh.gov.ph
Region IX	Regional Office IX, Veterans Avenue Extension,	RD CAYAMOMBAO D. DIA	Contact No(s).: (062) 991-0626 Fax No.: (062) 993-3008 Email: dia.cayamombao@dpwh.gov.ph

Region	Location	Regional Director	
	Tetuan, Zamboanga City, Philippines		
<u>Region X</u>	Regional Office X, DPWH Compound, Engineer's Hill, Bulua, Cagayan de Oro City, Misamis Oriental, Philippines	<u>RD LILIBETH N. APARECIO</u>	Contact No(s).: (088) 858-4323 Fax No.: (088) 858-8502 Email: <u>aparecio.lilibeth@dpwh.gov.ph</u>
<u>Region XI</u>	Regional Office XI, Ramon Magsaysay Ave., cor. Gov. Chavez St., Davao City, Philippines	<u>RD JUBY B. CORDON</u>	Contact No(s).: (082) 272-74-02 Fax No.: (082) 226-9370 Email: <u>cordon.juby@dpwh.gov.ph</u>
<u>Region XII</u>	Regional Office XII, Mabini Street Corner Alunan Avenue, Brgy. Zone III, Koronadal City, South Cotabato, Philippines	<u>RD BASIR M. IBRAHIM</u>	Contact No(s).: (083)228-3908 Fax No.: (083)228-9577 Email: <u>ibrahim.basir@dpwh.gov.ph</u>
<u>Region XIII</u>	Regional Office XIII, J. Rosales Avenue, Butuan City, Philippines	<u>RD ALEX B. RAMOS (OIC)</u>	Contact No(s).: (085) 526-1302 Fax No.: Email: <u>ramos.alex@dpwh.gov.ph</u>

2. **We invoke the constitutional and R.A. 6770 declaration that the Ombudsman is the protector of the people.**

STATEMENT OF FACTS

3. **All the facts in this submission are public knowledge, in public domain or even taking the character of judicial notice.** While Ombudsman complaints are ordinarily verified to declare the personal knowledge of the complainant, **verification is not required as the personal knowledge of the herein complainant is public knowledge of all Filipinos and the world.**
4. **To provide the *Statements of Facts* to support this *Ombudsman Complaint*, we enumerate the public facts:**
 - 4.1. President Ferdinand Marcos, Jr. (BBM) announced the top 15 flood control projects and published them on <https://sumbongsapangulo.ph/>. **The CEOs, Presidents and Board Members of the top 15 named by BBM are herein also impleaded along with the above DPWH officials.**
 - 4.2. Since then there are numerous reports from the Senate floor to social media of actual cases of graft and corruption from ghost and substandard flood control projects. Examples include:
 - Congressman Leandro Leviste was (attempted) bribed by a DPWH district engineer.²
 - Baguio City Mayor Benjamin Magalong declared billions of corruption in DPWH projects.³
 - Quezon City government discovered some P14B of 254 flood control projects including 23 that cannot be located, 5 uncompleted but reported completed, and 41 with identical contract amounts.⁴
 - 4.3. **It is incumbent on the Honorable Ombudsman to take the initiative to gather more evidence from the public domain, government offices and private respondent contractors.** The amount of money we are chasing here can fund the annual budget for the Department of Education every year. **It is beyond me to get access to this evidence but the Honorable Ombudsman has such vast power to compel the government offices to provide relevant information as evidence.**

² ABS-CBN News, "Leviste vs DPWH engineer: Become state witness, congressman tells bribery suspect | ABS-CBN News", <https://www.youtube.com/watch?v=5mMM8AbTh4I>, accessed August 29, 2025.

³ GMA Public Affairs, "Magalong, ibinunyag ang umano'y anomalya sa gov't projects -FULL INTERVIEW | Kapuso Mo, Jessica Soho", <https://www.youtube.com/watch?v=GUrhCehqGPc>, accessed August 29, 2025.

⁴ Saksi Express, August 29, 2025, <https://www.youtube.com/watch?v=BeStD4czYCE> playhead at 6:37, accessed August 30, 2025.

- 4.4. You would expect that BBM would have fired Secretary Bonoan given the billions upon billions of corruptions but he did not so the proud Secretary does not resign and even refused to resign.
- 4.5. Given that DPWH had some 900 billion allocated budget in 2025. According to Public Servant Magalong, only 30% of the project cost is actually spent on construction, which means that up to P630 billion of people's money could have been lost to corruption. That could fund the budget of the Judiciary for the next ten years. This amount is not far-fetched because Pasig Mayor Vico Sotto declared that some one trillion pesos of public money is being lost to corruption every year.
- 4.6. While there are talks of investigations in Congress (Senate and House), not only they are slow and all-talk but also **more crucially they are inappropriate to investigate the corruption for conflict of interest** as according to Public Servant Magalong some members of Congress are the main contractors and even suppliers of the corrupt projects. In other cases, they receive some fruits and juices of the corruption such as the case of Senate President Chiz Escudero when he received some P30 million in his campaign from a DPWH contractor or Senator Villanueva whose Bulacan province is the epicenter of this corruption.
- 4.7. While many report in public this widespread and nakakaiyak at nakapanglulumong pagnanakaw, **no one acts to hold the DPWH and their colluding contractors to account**, first among which is BBM. **Thus, I take this action NOW on behalf of Filipino people to hold the DPWH and their colluding contractors to account.**

STATEMENT OF LAW

5. Supervisors are accountable for the actions of their subordinates and products of those actions.

- 5.1. In *Porras vs. Avellana*⁵, the Supreme Court declared:

“Control and supervision have been elucidated in two cases as follows:

*In administrative law, supervision means **overseeing** or the power or authority of an officer **to see that subordinate officers perform their duties**. If the latter fail or neglect to fulfill them the former may take such action or step as prescribed by law to **make them perform these duties**. Control, on the other hand, means the power of an officer to **alter or modify or nullify or set aside what a subordinate officer had done in***

⁵ G.R. No. L-12366 (July 24, 1959)

*the performance of his duties **and to substitute the judgment** of the former for that of the latter. (Mondaño vs. Silvosa, 51 Off. Gaz., 2885).*

***Supervision** is not a meaningless thing. It is an **active power**. It is certainly not without limitation, but it at least implies authority to **inquire into facts and conditions** in order to render the power real and effective. If supervision is to be **conscientious and rational**, and not automatic and brutal, it must be founded **upon knowledge of actual facts and conditions disclosed after careful study and investigation**. (Planas vs. Gil, 37 Off. Gaz., 1228).” [emphasis added]*

- 5.2. In *Ombudsman vs Espina*⁶, the Supreme Court held: “As aptly observed by the CA, Espina had the **obligation to supervise his subordinates and see to it that they have performed their respective functions in accordance with law**...Indeed, the Court has pronounced that a **public officer's high position imposes upon him greater responsibility and obliges him to be more circumspect in his actions and in the discharge of his official duties**... The Court is not unaware of the ruling in *Arias v. Sandiganbayan (Arias)* that heads of offices may rely on their subordinates. For the *Arias* doctrine to apply, however, **there must be no reason for the head of offices to go beyond the recommendations of their subordinates**.” [emphasis added except underline]

PRAYER

6. WHEREFORE, we the *Complainants* file this *Ombudsman Complaint* against all DPWH officials and the top 15 contractors named above.
7. We pray that this *Ombudsman Complaint* be **promptly given due course and be properly investigated**.
8. THEREAFTER, we most respectfully prayed **for the Honorable Ombudsman to promptly resolve and punish the culpable officials administratively and, with the contractors, file criminal charges as appropriate**.
9. Other relief and remedies as may be just and equitable under the premises are also prayed for.

On behalf of the 116 million Filipinos,

September 1, 2025

⁶ G.R. No. 213500 (March 15, 2017)