

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-

House Speaker Ferdinand Martin Gomez Romualdez, Sr.,
Zaldy Co (Ako Bicol),
Roman Romulo (Pasig Lone District),
James “Jojo” Ang (Uswag Ilonggo),
Patrick Michael Vargas (Quezon City 5th District),
Juan Carlos “Arjo” Atayde (Quezon City 1st District),
Nicanor Briones (Agap),
Marcelino “Marcy” Teodoro (Marikina City 1st District),
Eleandro Jesus Madrona (Romblon Lone District),
Benjamin “Benjie” Agarao Jr. (Laguna 4th District),
Leody “Odie” Tarriela (Occidental Mindoro Lone District),
Reynante Arrogancia (Quezon 3rd District),
Marvin Rillo (Quezon City 4th District),
Antonieta Eudela (formerly of Zamboanga Sibugay 2nd District),
Dean Asistio (Caloocan City 3rd District),
Marivic Co-Pilar (Quezon City 6th District),
AND THEIR BAGMEN (as named by the Discayas and those to be identified in
the course of investigation),
AND DPWH Officials
Eduarte Virgilio (Bicol),
Ramon Arriola III (Unified Project Management Office or UPMO),
Henry Alcantara (Bulacan 1st District Engineering Office or DEO),
Robert Bernardo (Undersecretary),
Aristotle Ramos (Metro Manila 1st DEO-Pasig City),
Manny Bulusan (North Manila DEO),
Edgardo Pingol (Bulacan Sub-DEO), and
Michael Rosaria (Quezon 2nd DEO)
Respondents.

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OMBUDSMAN COMPLAINT

COMPLAINANTS, on their own and on behalf of the Filipinos, respectfully state:

PREFATORY STATEMENT

*“By ensuring that **no one in government has too much power**, the Constitution helps **protect ordinary Filipinos** every day **against abuse of power** by those in authority.” – John Roberts adapted for Filipinos by ██████*

*“There is nothing honorable (especially as a position title) about a public official or public body who wilfully abuses the power entrusted to it by the people. Rather than false respect and unnecessary reluctant deference, **severe punishment is due** him/it.” – ██████*

*“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]*

*“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*

NATURE OF THE ACTION

1. This action to hold to public accountability under the administrative law and criminal responsibility under the criminal law **the 16 current members of the House of Representatives specifically named in the very public exposé of spouses Pacifico “Curlee” Discaya and Cezarah Rowena "Sarah" Cruz Discaya** on the Third Hearing at the Senate “The Philippines Under Water” held on September 8, 2025 (hereafter as the *Third Senate Hearing*).
2. **I on behalf of the Filipino people, the Complainants**, from whom all power emanates in a true democracy, **submits this urgent Ombudsman Complaint against all 16 incumbent members of the House of Representatives of the Philippines** (hereafter as *Ombudsman Complaint* or sometimes the *Document* or *Submission*) **as individually named in the joint sworn affidavit of the Discayas read out aloud in the said Third Senate Hearing**, namely:

- (1) House Speaker Ferdinand Martin Gomez Romualdez, Sr.
- (2) Zaldy Co (Ako Bicol)
- (3) Roman Romulo (Pasig Lone District)
- (4) James “Jojo” Ang (Uswag Ilonggo)

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

- ## THE PARTIES

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STATEMENT OF FACTS

8. **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.**
9. **Most crucially, the primary basis of this complaint is the joint sworn affidavit of the Discayas. I ask that the Ombudsman so request a copy of it from the Senate. The Ombudsman can so request too the official report of the Senate Hearings on this senate inquiry.**
10. **To provide the *Statements of Facts* to support this *Ombudsman Complaint*, we enumerate some of the public facts:**
11. President Ferdinand Marcos, Jr. (BBM) announced the top 15 flood control projects and published them on <https://sumbongsapangulo.ph/>.
 - 11.1. 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
 - 11.2. The latest of these public inquiries is the *Third Senate Hearing*. The joint sworn affidavit of the Discayas are read aloud in the video⁵:

<https://www.youtube.com/watch?v=rSFcZOrhPrA>

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.

⁵ Inquirer, “LIVE: Senate blue ribbon panel resumes hearing on anomalous flood control projects | Sept 8”, September 8, 2025, accessed September 9, 2025.

The joint sworn affidavit of the Discayas are read aloud in the video.

11.3. **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.

11.4. 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.

11.5. While there are ongoing 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 ex-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.

11.6. While many report in public this widespread and nakakaiyak at nakapanglulumong pagnanakaw, **no one acts to hold the Respondent congressmen and DPWH and other public officials and their colluding contractors to account. Thus, I take this action NOW and FORTHWITH on behalf of Filipino people to hold them to account.**

STATEMENT OF LAW

12. **We complain against the Respondents for committing administrative offenses:**

- *contrary to law or regulations;*
- *unreasonable, unfair, oppressive or discriminatory;*
- *inconsistent with the general course of public office's functions though in accordance with law;*
- *in the exercise of discretionary powers but for an improper purpose;*
- *otherwise irregular, immoral or devoid of justification;*

- *such other grounds provided for under E.O. 292 and other applicable laws.*⁶

13. **We also complain against their criminal offenses** “*in violation of RA 3019, as amended; RA 1379, as amended; RA 6713; Revised Penal Code, Title VII, Chapter II, section 2; RA 7080, as amended, and for such other offenses committed by public officers and employees in relation to office*”.⁷

PRAYER

14. WHEREFORE, we the *Complainants* file this *Ombudsman Complaint* against all 16 members of the House of Representatives named and the DPWH officials (and other private persons to be identified in the course of the Ombudsman investigation) above.
15. We pray that this *Ombudsman Complaint* be **promptly given due course and be properly investigated.**
16. 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.**
17. Other relief and remedies as may be just and equitable under the premises are also prayed for.

On behalf of the 116 million Filipinos,

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September 9, 2025

⁶ Ombudsman FAQ “What are the grounds for filing a criminal complaint?”, <https://www.ombudsman.gov.ph/frequently-asked-questions/> , accessed September 9, 2025.

⁷ Ibid.