

### Title: Ricardo O. Trinidad, Jr. vs. Office of the Ombudsman and Field Investigation Office, Office of the Ombudsman

### Facts:

Ricardo O. Trinidad, Jr. served as Engineer II in the DPWH-Quezon City Second Engineering District, assigned to oversee laborers under the Oyster Program. He signed the daily time records (DTRs) for Michael Bilaya, Danilo Martinez, Norwena Sanchez, and Danilo dela Torre for April and May 2005. It was discovered that some of these individuals were simultaneously employed by the MMDA and the Office of Congresswoman Nanette C. Daza, receiving multiple compensations.

The Field Investigation Office (FIO) of the Office of the Ombudsman initiated an administrative case against Ricardo and others for dishonesty, gross neglect of duty, grave misconduct, and conduct prejudicial to the best interest of the service. On November 5, 2014, the Ombudsman found Ricardo guilty of gross neglect of duty, resulting in dismissal from service. Ricardo appealed to the Court of Appeals (CA), which affirmed the Ombudsman's decision. Subsequently, he filed a Petition for Review on Certiorari under Rule 45 to the Supreme Court, challenging the findings of gross negligence.

### Issues:

1. Whether the reliance solely on a subordinate's logbook for signing workers' DTRs constitutes gross negligence.
2. Distinction between administrative and criminal negligence.

### Court's Decision:

The Supreme Court partially granted the petition, modifying the CA's decision. It was determined that Ricardo's reliance on a subordinate's logbook amounted to simple negligence, not gross negligence. The Court differentiated between simple and gross negligence, with the former described as failure due to carelessness or indifference and the latter characterized by a want of even slight care or a conscious indifference to consequences.

The Court noted the differences in Ricardo's responsibilities compared to those in the cited Arias case and highlighted the distinctions between administrative and criminal negligence, concluding that good faith might not exempt a public official from administrative liability. Ricardo was found guilty of simple negligence and suspended for two months without pay.

### Doctrine:

This case distinguishes between simple and gross negligence in administrative cases, emphasizing that even minor tasks entrusted to public officers must be executed with due diligence. Additionally, it clarifies that reliance on subordinates does not automatically exempt heads of offices from liability.

### Class Notes:

- **Simple Negligence vs. Gross Negligence**: Simple negligence involves carelessness or indifference, requiring a lesser form of neglect than gross negligence, which involves willful avoidance of duty.
- **Administrative vs. Criminal Negligence**: Administrative proceedings aim to protect public service and uphold public trust, while criminal proceedings seek to punish offenders. Good faith may relieve criminal liability but not necessarily administrative liability.
- **Reliance on Subordinates**: Public officials must exercise due diligence even when delegating tasks to subordinates. Blind reliance could result in administrative liability for negligence.
- **Public Office as a Public Trust**: All public officers must serve with the highest degree of responsibility, integrity, loyalty, and efficiency, as mandated by the 1987 Philippine Constitution, Article XI, Section 1.

### Historical Background:

The case underscores the accountability of public officials in the Philippines, emphasizing the principle that public office is a public trust. It reflects the judiciary's ongoing efforts to clarify the standards of care and diligence expected from government employees, distinguishing between degrees of negligence and types of liability to uphold the integrity of public service.