

****Title:**** Angelita Amparo Go vs. Office of the Ombudsman, Insurance Commissioner Eduardo T. Malinis, and Norberto F. Castro

****Facts:****

Angelita Amparo Go, Treasurer and Vice-President of Wear Me Garment Manufacturing Inc., filed insurance claims totaling P29,778,000 with 14 insurance companies following a fire incident. Experiencing delays in the resolution of these claims, Go sought assistance from the Insurance Commission (Commission) in January 1994, which resulted in a conference with no resolution. Subsequently, Go accused the Commission of conspiring with insurance companies to deny her claims, prompting several legislative inquiries and further conferences facilitated by the Commission.

In June 1994, Go filed a complaint against the insurance companies in the Commission (Adm. Case No. RD-156) for alleged violation of the Insurance Code's provisions on prompt claim settlements. During the administrative proceedings, Go also initiated a civil case for Specific Performance with Damages against the same defendants in the Regional Trial Court of Quezon City (Civil Case No. Q-95-23135). The Commission suspended Adm. Case No. RD-156, citing the need to avoid conflict with the court's determination of the civil case. Go then filed a Complaint-Affidavit with the Office of the Ombudsman against the Insurance Commissioner Eduardo T. Malinis and Hearing Officer Norberto F. Castro, accusing them of violating the Anti-Graft and Corrupt Practices Act. The Ombudsman eventually dismissed the charges, leading to Go's petition for review on certiorari before the Supreme Court.

****Issues:****

1. Whether an administrative case pending before an administrative tribunal can proceed independently despite the subsequent filing of a related civil case.
2. Whether separate hearings for each respondent in an administrative case, involving the same issues and facts as a civil case, violate constitutional rights to the speedy disposition of cases.
3. Whether the suspension of administrative proceedings due to the pending determination of a related civil case constitutes grave abuse of discretion.

****Court's Decision:****

The Supreme Court found the petition devoid of merit, affirming the dismissal of charges by the Ombudsman. It held that there was no grave abuse of discretion, as the Commission's actions, including separate hearings and suspension of the administration case, were within the regular performance of duties. The Court underscored the policy of non-interference

with the Ombudsman's prosecutory powers and found no evidence of undue injury inflicted upon Go by the respondents' actions. The Court also directed the Insurance Commission to continue with Adm. Case No. RD-156 expeditiously.

****Doctrine:****

This case reiterates the principle that the Office of the Ombudsman's exercise of its investigatory and prosecutory powers should not be interfered with by the courts, barring good and compelling reasons to do otherwise. It also highlights the importance of concrete evidence to substantiate charges in legal proceedings.

****Class Notes:****

- ****Administrative vs. Civil Proceedings:**** Administrative cases can proceed independently alongside civil cases, even if they involve the same parties and facts.
- ****Burden of Proof:**** The complainant must prove their allegations with competent and substantial evidence beyond mere accusations or presumptions.
- ****Non-interference with the Ombudsman:**** The judiciary generally refrains from interfering in the prosecutorial discretion of the Ombudsman absent compelling reason.
- ****Evidence in Administrative Cases:**** Substantial evidence is required to support a claim in administrative proceedings, unlike the preponderance of evidence required in civil cases.

****Historical Background:****

This case signifies the intertwining complexities between administrative and judicial proceedings in the Philippine legal system, especially involving public officials and private entities. It underscores the challenges in navigating both arenas simultaneously, while protecting the interests of justice and public order.