

Title: Garcia-Rueda vs. Pascasio, et al.

Facts:

1. Florencio V. Rueda, husband of petitioner Leonila Garcia-Rueda, underwent a surgery at UST Hospital for removal of a ureteral stone, attended by Dr. Domingo Antonio Jr. (surgeon) and Dr. Erlinda Balatbat-Reyes (anaesthesiologist).
2. Six hours post-surgery, Florencio died due to complications of unknown cause according to UST Hospital officials.
3. Unsatisfied with hospital findings, petitioner requested NBI to perform an autopsy, which revealed the death was due to lack of care in administering anesthesia.
4. NBI recommended charging Dr. Antonio and Dr. Reyes with Homicide through Reckless Imprudence before the Office of City Prosecutor.
5. Initial assignment to Prosecutor Antonio M. Israel, who inhibited himself due to relation to one counsel, led to case re-affle to Prosecutor Norberto G. Leono, later disqualified on petitioner's motion for disregarding laws on preliminary investigation.
6. Case transferred to Prosecutor Ramon O. Carisma, recommended charging Dr. Reyes and dismissing against Dr. Antonio.
7. On recommendation for re-affle by Assistant City Prosecutor Josefina Santos Sioson alleging partiality, the case went to Prosecutor Leoncia R. Dimagiba, who endorsed it for charging Dr. Antonio and dismissing against Dr. Reyes.
8. Petitioner filed for reconsideration on Dimagiba's resolution and the case was reassigned to Prosecutor Eudoxia T. Gualberto, who included Dr. Reyes in the charges.
9. Subsequently, Senior State Prosecutor Gregorio A. Arizala exonerated Dr. Reyes, a resolution approved by City Prosecutors Macaraeg and Guerrero.
10. Aggrieved, petitioner charged City Prosecutors with manifest partiality under R.A. 3019 (Anti-Graft and Corrupt Practices Act) before Ombudsman, which dismissed for lack of evidence.
11. Petitioner faulted Ombudsman for grave abuse of discretion in not finding probable cause against city prosecutors.

Issues:

1. Can the Supreme Court review the findings of the Office of the Ombudsman?
2. Did the Ombudsman commit grave abuse of discretion by not finding probable cause and dismissing the petitioner's complaints against the City Prosecutors?

Court's Decision:

1. Review of Ombudsman's decisions:

- The Court reaffirmed its stance that it generally does not interfere with the discretion of prosecutors or the Ombudsman in determining probable cause unless there's grave abuse of discretion.

2. Grave abuse of discretion:

- Despite sympathizing with the petitioner, the Court found no grave abuse of discretion in the Ombudsman's decision.

3. Explanation of grave abuse:

- Defined as a power exercised in a manner that is arbitrary or despotic by reason of passion or personal hostility.

4. The Court found the series of reassignments among prosecutors unusual but not sufficient as evidence of partiality without further substantiation.

5. Concluded that the Ombudsman's dismissal was within its authority, noting absence of clear evidence showing manifest partiality or gross inexcusable negligence by the City Prosecutors.

6. Directive:

- The petition was dismissed, with guidance that petitioner may still appeal the prosecutor's decision to dismiss the criminal complaint to the Secretary of Justice.

Doctrine:

- The Court upholds non-interference in prosecutorial discretion in determining probable cause unless there is clear evidence of grave abuse of discretion.

- Defines probable cause not needing absolute certainty but reasonable belief based on facts.

- Reiterates the necessity of expert testimony in medical negligence cases and outlines the elements of duty, breach, injury, and proximate causation.

- Emphasizes that specific evidence and standards of care are crucial in medical malpractice claims.

Class Notes:

- Prosecutory discretion: Generally immune from judicial review unless grave abuse of discretion is evident.

- Medical negligence: Obligation, breach, injury, and causation are key elements to establish liability.

- RR.A. No. 3019 (Anti-Graft and Corrupt Practices Act): Focus on public officials' liability through manifest partiality, evident bad faith, or gross negligence causing undue injury or unwarranted benefits.

- Probable cause: Based on reasonable grounds, not absolute certainty; to be distinguished

from substantive evidence required for conviction.

- Remedies for aggrieved parties: Appeals to higher departmental authorities (e.g., Secretary of Justice) may be more appropriate than judicial petitions.

Historical Background:

- Reflects ongoing issues with transparency and accountability in the conduct of public duties by officials in the Philippines.

- Highlights procedural intricacies and potential delays within the prosecutorial system.

- Demonstrates the judiciary's role in ensuring the integrity of prosecutorial processes while respecting the boundaries of discretion.