

Title: Enrique “Totoy” Rivera Y De Guzman vs. People of the Philippines

Facts: On March 20, 1993, Police Inspector Edward M. Leygo, along with a police team, was patrolling Halsema Highway in La Trinidad, Benguet and encountered a truck unloading chicken dung in violation of a municipal ordinance. The police instructed the driver to halt the activity and escorted the truck away. However, the truck attempted to unload again in another location, leading to another intervention by the police, now including additional officers following Inspector Leygo’s directive. At the scene, the petitioner, Enrique “Totoy” Rivera, instructed the truck driver to disobey the police and proceed with unloading. When Inspector Leygo confronted Rivera, an altercation ensued, where Rivera, after verbal threats, physically assaulted Leygo. Rivera was subsequently arrested, received medical examination alongside Leygo, and faced charges for direct assault. The trial court found Rivera guilty, a decision later affirmed by the Court of Appeals, leading to this petition in the Supreme Court.

Issues: The key issue was whether the Court of Appeals erred in affirming Rivera’s conviction for direct assault by, among others, challenging the credibility of the police officer’s testimony, disputing Rivera’s capability and intention to assault Leygo given the police presence, and questioning whether Leygo was in the performance of official duties during the incident.

Court’s Decision: The Supreme Court affirmed the appellate court’s decision, rejecting the petitioner’s arguments point by point. It held that the discrepancies and nuances in testimonies did not diminish their credibility or the fact of the assault; that the testimony of a single, credible witness could be sufficient for conviction; that a physical retaliation by other officers was not a necessary outcome to prove the assault happened; and that Inspector Leygo was indeed in the performance of his official duties when assaulted. The Court also dismissed the petitioner’s challenge on procedural grounds regarding the non-presentation of the medical examiner, emphasizing the primacy of the assaulted officer’s testimony over the medical certificate.

Doctrine: The Supreme Court reiterated the doctrine that the testimony of a single witness, if found credible, straightforward, and consistent, is sufficient to support a conviction. Additionally, it confirmed that an officer engaged in law enforcement duties, including the enforcement of municipal ordinances, is performing official duties, and any assault in this context can sustain a charge of direct assault.

Class Notes:

- Key elements of direct assault include the attack, use of force, or serious intimidation/resistance against a person in authority or their agents during or on occasion of the performance of official duties.
- The credibility of witnesses is chiefly determined by the trial court due to its unique position to observe the demeanor of witnesses.
- The performance of official duties encompasses a wide range of actions taken by police officers, including routine patrol and enforcement of laws or ordinances.
- A single, credible testimony can be sufficient for conviction; corroborative evidence is necessary only under suspicion of truth falsification.

Historical Background: The case highlights the enforcement challenges of local ordinances and the resistance law enforcement personnel may face while performing their duties. It exemplifies the legal protections afforded to officers under Philippine law, emphasizing the serious legal consequences of assaulting or resisting police authority, even in seemingly minor regulatory contexts.