

Title:

Noel Villanueva vs. People of the Philippines and Yolanda Castro

Facts:

This case involves petitioner Noel Villanueva, a Municipal Councilor of Concepcion, Tarlac, and private complainant Yolanda C. Castro, the Municipal Vice Mayor. On September 12, 1994, an incident occurred leading to Villanueva being charged with Grave Oral Defamation and Slander by Deed against Castro. The altercation revolved around the refusal of Castro to immediately attend to Villanueva's application for monetized leave, resulting in a verbal and physical confrontation at the municipal hall, witnessed by several individuals.

The 2nd Municipal Circuit Trial Court (MCTC) of Capas-Bamban-Concepcion heard the criminal complaints, and after the trial, found Villanueva guilty of both charges. Both parties appealed to the Regional Trial Court (RTC) of Tarlac, which affirmed the MCTC's decision with modifications regarding penalties and damages awarded. The Court of Appeals also affirmed the RTC's decision but removed the award for exemplary damages. Villanueva's motion for reconsideration was denied, leading to the petition for review in the Supreme Court.

Issues:

1. Whether the Court of Appeals erred in sustaining the conviction of Villanueva for grave oral defamation.
2. Whether the Court of Appeals erred in sustaining the conviction of Villanueva for serious slander by deed.

Court's Decision:

The Supreme Court partially granted Villanueva's petition. It modified the Court of Appeals' decision, finding Villanueva guilty of only slight oral defamation and simple slander by deed due to the perceived provocation by Castro. The Court underscored that while Villanueva's actions were disrespectful, they were triggered by Castro's refusal to sign his leave monetization request and her actions during their altercation. Consequently, the Court imposed a fine of P200.00 for each conviction, with subsidiary imprisonment in case of insolvency, and deleted the awards for moral damages and attorney's fees.

Doctrine:

The Supreme Court reiterated that the gravity of oral defamation depends upon the expressions used, the personal relations of the accused and the offended party, and the

circumstances surrounding the case. It also affirmed that uttering defamatory words in the heat of anger, with provocation from the offended party, constitutes only a light felony. Moreover, slander by deed's nature depends on the social standing of the offended party, the act's circumstances, and if the act casts dishonor, discredit, or contempt upon the offended party.

Class Notes:

- **Elements of Oral Defamation (Slander):** Serious and insulting nature; consideration of accused and offended party's personal relations; circumstance surrounding the incident.
- **Elements of Slander by Deed:** Performance of an act casting dishonor, discredit, or contempt upon another; act's seriousness judged by various factors, including the social standing of involved parties and provocation presence.
- **Provocation and Response:** Where there is provocation by the offended party, resulting responses may be taken into account to mitigate the gravity of the offense.
- **Legal Provisions:** Reference to Articles 358 and 359 of the Revised Penal Code, focusing on the definitions and penalties for oral defamation and slander by deed.

Historical Background:

This case highlights the legal consequences of actions and speeches by public officials within their official premises. It emphasizes the judiciary's role in assessing the context of actions that lead to criminal charges, especially the impact of provocation and the social responsibilities of public officials.