

Title:

Fernando Sazon y Ramos vs. Court of Appeals and People of the Philippines

Facts:

Petitioner Fernando Sazon and private complainant Abdon Reyes were both residents of PML Homes in Parang, Marikina, and members of the PML-Parang Bagong Lipunan Community Association, Inc., which had a monthly newsletter called the "PML-Homemaker," edited by Sazon.

1. **Election:** On December 11, 1983, the PML-BLCA held an election for its board of directors. Sazon was elected as director and president, while Reyes lost.
2. **Protest:** On January 16, 1984, Reyes protested the election results to the Estate Management Office of the Home Financing Corporation (EMO-HFC), citing irregularities.
3. **Communication:** Reyes wrote to the homeowners on January 18, 1984, explaining his protest and urging non-recognition of the new board.
4. **Intervention:** The EMO-HFC mandated a referendum supervised by them.
5. **Leaflets and Graffiti:** Leaflets maligning Sazon and graffiti questioning his integrity appeared, allegedly linked to Reyes.
6. **Sazon's Publications:** In response, Sazon circulated newsletters, including a defamatory article on February 10, 1984, in the PML-Homemaker.
7. **Libel Complaint:** Reyes filed a libel complaint against Sazon, leading to the filing of an Information for libel on May 25, 1984.
8. **Trial:** Sazon was found guilty of libel by the Regional Trial Court on March 18, 1992, sentencing him to imprisonment and a fine.
9. **Appeal and CA Decision:** Sazon appealed, but the Court of Appeals affirmed the trial court's decision on June 19, 1995.

Issues:

1. Whether the article constituted privileged communication, hence not actionable.
2. Whether the words in the article were defamatory and written without malice.
3. Whether the article caused damage to Reyes's reputation.
4. Whether a fine alone, without imprisonment, was a sufficient penalty if the conviction was warranted.

Court's Decision:

1. **Privileged Communication:** The Court ruled that the article was not privileged communication. It was not a private communication made in the performance of any legal,

moral, or social duty, nor was it a fair report of any official proceedings. It was publicly circulated and attacked Reyes's private character unrelated to his official duties at the Department of Trade and Industry.

2. **Defamatory Nature:** The Court found the words used in the article such as "mandurugas" and "mastermind sa paninirang puri" defamatory as they imputed a crime, vice, or defect, exposing Reyes to public ridicule and contempt. The test for defamatory words was satisfied as the words induced suspicion and impeached Reyes's honesty and reputation.

3. **Malice Presumption:** Malice was presumed under Article 354 of the Revised Penal Code. The Court held that Sazon failed to show good intention or justifiable motive, and the circumstances indicated animosity and intent to injure Reyes's reputation.

4. **Damage to Reputation:** The Court emphasized that the defamatory language used had indeed damaged Reyes's reputation, affecting his public image adversely.

5. **Penalty:** The Court modified the penalty, imposing a fine of P3,000 with subsidiary imprisonment in case of insolvency, instead of imprisonment.

Doctrine:

- **Libel:** Defined under Article 353 of the Revised Penal Code, involving a public and malicious imputation tending to cause dishonor, discredit, or contempt.
- **Presumption of Malice:** Under Article 354, defamatory imputations are presumed malicious unless good intention and justifiable motive are shown.
- **Qualified Privilege:** Communications of misconduct are only privileged if addressed to someone with supervisory or investigatory authority.

Class Notes:

- **Key Elements of Libel:** Defamatory imputation, malicious intent (presumed under Article 354), public dissemination, and identifiable victim.
- **Legal Statutes:** Article 353 and 354 of the Revised Penal Code.
- **Interpretations:** Public attacks on private character unrelated to one's official duties are not protected as privileged communication; defamation may lead to presumed malice without need for factual proof.

Historical Background:

This case took place during a time when local homeowners' associations played significant

roles in community governance and social events. The context revolved around election disputes in such associations, showcasing how personal rivalries can escalate into legal battles over reputation and public discourse, highlighting the significance of libel laws in regulating defamatory communication.