

Title: Enrique G. De Leon vs. People of the Philippines and SPO3 Pedrito L. Leonardo (G.R. No. 206042)

Facts:

- Incident and Charge:** On April 17, 2006, Enrique De Leon was accused of uttering defamatory words to SPO3 Pedrito L. Leonardo at the PLEB premises, calling him a “Walanghiya kang mangongotong na pulis ka, ang yabang yabang mo noon. Patay ka sa akin ngayon,” resulting in a Grave Oral Defamation charge filed before the MeTC, docketed as Criminal Case No. 453376-CR.
- Initial Complaint:** Prior to this, De Leon and his son filed a grave misconduct complaint against SPO3 Leonardo. A confrontation occurred during the administrative hearing when De Leon allegedly made the defamatory statements.
- Trial in MeTC:** The prosecution presented three witnesses to substantiate the charges. The Court found De Leon guilty of Grave Oral Defamation and sentenced him to 4 months and 1 day as a minimum to 1 year, 1 month, and 11 days as a maximum.
- Appeal Process:** De Leon appealed to the RTC; the latter affirmed the MeTC’s decision but dismissed the appeal due to procedural lapses. De Leon’s subsequent motion for reconsideration was granted, and he filed an appeal memorandum.
- CA Ruling:** The Court of Appeals upheld the RTC’s ruling but modified the minimum imposed penalty. De Leon further sought reconsideration, which was denied.

Issues:

- Sufficiency of the MeTC Decision:** Whether the MeTC decision failed to meet constitutional and procedural requirements by not clearly stating the facts and law bases.
- Proof of Guilt Beyond Reasonable Doubt:** Whether De Leon’s guilt was proven beyond a reasonable doubt.

Court’s Decision:

- Clarity of MeTC Decision:** The Supreme Court determined that the MeTC decision adhered to constitutional requirements, presenting a clear and detailed account of the facts and the law applied. The decision was comprehensive, ensuring parties were fully aware of the reasoning behind the judgment (affirming CA’s view).
- Guilt Beyond Reasonable Doubt:** The Supreme Court supported the findings of the lower courts concerning witness credibility and the weight of the evidence, observing that De Leon’s utterances were inherently defamatory.
- Reclassification to Slight Oral Defamation:** The Court modified De Leon’s conviction from Grave Oral Defamation to Slight Oral Defamation considering the context of the

altercation and its non-serious nature. The penalty was adjusted to a fine of P200.00 with subsidiary imprisonment in case of insolvency and moral damages reduced to P5,000.00.

****Doctrines:****

- ****Constitutional Jurisprudence:**** Decisions must clearly and distinctly state the facts and the law upon which they are based (Section 14, Article VIII of the Constitution).
- ****Defamation Law:**** The context and nature of the relationship between parties can influence the gravity of oral defamation.
- ****Public Officer Criticism:**** Public officers, especially those in authority like police officers, are expected to tolerate criticism unless it directly impacts personal integrity unrelated to public duties.

****Class Notes:****

- ****Elements of Oral Defamation:****
 - Oral imputation of a crime, vice, or defect
 - Made publicly
 - With malicious intent
 - Targeting a natural or juridical person
 - Resulting in discredit or contempt

****Article / Legal Provision:****

- Article 358 of the Revised Penal Code details slight oral defamation and its penalties.

****Historical Background:****

This case highlights societal views on public officers' integrity and the thresholds for permissible criticism. Post-Marcos era reform focused on delineating and enforcing standards against corruption and abuse by police and public servants, fostering a judicial environment scrutinizing both public duty performance and personal misconduct. It reflects the broader historical context of civic empowerment and the judiciary's role in balancing freedom of speech with personal dignity and professional accountability.