

Title: Restituto Ynot vs. Intermediate Appellate Court, et al.

Facts:

Restituto Ynot, the petitioner, transported six carabaos from Masbate to Iloilo on January 13, 1984. The animals were confiscated by the police station commander in Barotac Nuevo, Iloilo, for allegedly violating Executive Order No. 626-A, which prohibited the interprovincial movement of carabaos. In response, Ynot filed a suit for recovery and managed to secure a writ of replevin after posting a supersedeas bond of P12,000 with the Regional Trial Court of Iloilo City. The court, however, eventually ruled in favor of upholding the confiscation and ordered the bond forfeited since the carabaos could no longer be produced. Moreover, the trial court chose not to pass judgment on the constitutionality of the executive order, citing lack of authority and presumption of its validity.

Dissatisfied, Ynot appealed to the Intermediate Appellate Court, which affirmed the decision of the trial court. Ynot then elevated the case to the Supreme Court via a petition for review on certiorari, challenging the constitutionality of Executive Order No. 626-A, particularly its provision allowing the summary confiscation of transported carabaos or carabeef without judicial proceedings.

Issues:

1. Does Executive Order No. 626-A violate the due process clause mandated by the Constitution?
2. Was there an improper exercise of legislative power by the President under Amendment No. 6 of the 1973 Constitution?
3. Is there a reasonable connection between the executive order's restrictions and its avowed purpose of protecting the carabao population?

Court's Decision:

The Supreme Court declared Executive Order No. 626-A unconstitutional. The Court reasoned that the executive order failed the test of lawful method, as it did not establish a justifiable connection between the outright ban on the interprovincial transport of carabaos and the preservation of their population. Furthermore, the penalty of confiscation without the opportunity for a proper hearing infringes upon the due process rights of the owners.

The Court also observed the improper delegation of legislative power to administrative authorities, who were granted broad discretion in the distribution of the confiscated property without clear standards or guidelines. Despite this, the Court recognized that the

police station commander was not liable for damages as he enforced a measure that was, at the time, presumptively valid.

Doctrine:

In this case, the Court reiterated the essence of due process, which requires that a person's life, liberty, or property may not be taken without notice and a meaningful opportunity to be heard. Additionally, the power to adjudge guilt and impose penalties is an inherently judicial function that cannot be arbitrarily assumed by executive authorities.

Class Notes:

- The essence of due process: notice and an opportunity to be heard.
- Due process exceptions: instances in which the summary administrative action may be justified.
- The presumption of constitutionality of laws: while laws are presumed constitutional, this presumption is rebuttable.
- Principles guiding proper delegation of legislative powers: necessity of standards and limitations to guide administrative discretion.
- Executive Order No. 626-A's ban on transportation of carabaos and carabeef and its summary confiscation provisions violate due process.

Historical Background:

Executive Order No. 626-A was promulgated by President Ferdinand E. Marcos in the context of conserving the carabao population in the Philippines, which was considered vital for agricultural purposes and draft work. The executive order was an extension of the policing power deemed necessary in the face of the country's worsening energy crisis and the dependence on carabaos for labor in farming communities. The Supreme Court's ruling in *Restituto Ynot vs. Intermediate Appellate Court et al.* ultimately underscored the enduring vitality of due process rights even against government measures claiming to serve the public welfare.