

### Title: THE PEOPLE OF THE PHILIPPINE ISLANDS vs. WONG CHENG (ALIAS WONG CHUN)

### Facts:

The case initiates with an information filed in the Court of First Instance of Manila, wherein Wong Cheng (alias Wong Chun) was accused of illegally smoking opium aboard the merchant vessel Changsa, an English ship, while it was anchored in Manila Bay, a distance of two and a half miles from the city's shores. Wong Cheng demurred to the information, challenging the jurisdiction of the Philippine court over the offense purportedly owing to the location and circumstance of the said act - on a foreign merchant vessel within territorial waters but not on Philippine soil. The Court of First Instance sustained the demurrer, essentially agreeing with Wong Cheng's argument regarding jurisdiction, thereby dismissing the case. The Attorney-General, representing the plaintiff and appellant, took the matter to the Philippine Supreme Court, seeking to overturn the lower court's dismissal based on jurisdictional grounds.

### Issues:

1. Whether or not the Philippine courts have jurisdiction over crimes committed aboard foreign merchant vessels anchored within the territorial waters of the Philippines.
2. If such jurisdiction exists, does smoking opium aboard a foreign merchant vessel anchored in Philippine territorial waters constitute a violation of Philippine law sufficient to warrant local judicial intervention?

### Court's Decision:

The Supreme Court of the Philippines reversed the decision of the Court of First Instance of Manila, holding that the Philippine courts do have jurisdiction over crimes committed aboard foreign merchant vessels when anchored in Philippine territorial waters, especially when these crimes disturb the public order.

The Court clarified that while generally, the mere possession of prohibited items (such as opium) aboard a foreign vessel may not constitute a crime triable by Philippine courts, the act of consuming opium within the territorial limits—even aboard a foreign vessel—does disrupt local public order and contravenes the purposes of Philippine laws enacted to prevent such effects. Consequently, the Court deemed that smoking opium aboard a foreign merchant ship within Philippine territorial waters falls under local jurisdiction and thus directed the case to proceed in the lower court in accordance with Philippine law.

### ### Doctrine:

The Supreme Court reiterated the territoriality principle of jurisdiction under international law, emphasizing that crimes committed aboard foreign merchant vessels within the territorial waters of the Philippines that disturb the public order are subject to the jurisdiction of Philippine courts.

### ### Class Notes:

- **Jurisdiction over Foreign Vessels:** The Philippine courts have jurisdiction over crimes committed on foreign merchant vessels within Philippine territorial waters that disturb the local public order.
- **Disturbance of Public Order:** A crime onboard a foreign vessel is triable in local courts if it disrupts the public peace, regardless of the vessel's nationality, emphasizing sovereign law's reach in protecting societal interests.
- **Territoriality Principle:** This principle underlines that a nation has jurisdiction over crimes committed within its territorial boundaries, including its territorial waters, highlighting the balance between national sovereignty and international comity.

### ### Historical Background:

This case centers on the intersection of national jurisdiction and international law, specifically addressing the scope of a nation's authority to enforce its laws aboard foreign ships within its territorial waters. It occurs during a period when the Philippines was under U.S. territory influence, hence relying significantly on U.S. legal precedents and international law principles to resolve jurisdictional conflicts. The decision reflects the evolving nature of law concerning maritime activities and the protection of public order within territorial jurisdictions.