

Title:

Mauricio Cruz vs. Stanton Youngberg (56 Phil. 234)

Facts:

Mauricio Cruz imported ten large cattle from Australia into the Philippines. He sought the issuance of a permit for the landing and slaughter of these cattle from Stanton Youngberg, the Director of the Bureau of Animal Industry. The permit was necessary due to Act No. 3155, which prohibited the importation of cattle from foreign countries into the Philippines after March 31, 1925, except under specific conditions. Cruz challenged the constitutionality of Act No. 3155, arguing that it was enacted solely to prevent cattle diseases from entering the Philippines. Cruz originally brought the petition to the Court of First Instance of Manila, seeking a writ of mandatory injunction against Youngberg. A demurrer was filed by Youngberg, arguing that Act No. 3155 was constitutional and, even if declared otherwise, Act No. 3052 would still prohibit the permit's issuance. The Court of First Instance sustained the demurrer, leading to the dismissal of the case due to Cruz's failure to file another complaint. The appeal was then lodged with the Supreme Court.

Issues:

1. Whether Act No. 3155 is constitutional.
2. Whether declaring Act No. 3155 unconstitutional would entitle the petitioner to the relief sought, considering Act No. 3052.

Court's Decision:

The Supreme Court affirmed the decision of the lower court, holding that Act No. 3155 was constitutional and valid. The Court decided not to pass on the constitutionality of Act No. 3155 unnecessarily, as even if it were declared unconstitutional, Act No. 3052 would still prevent the issuance of the permit sought by Cruz. The Court emphasized that the legislature's motive in enacting Act No. 3155 was to protect the local cattle industry and prevent disease, a valid exercise of police power.

Doctrine:

This case reiterates the doctrine that the promotion of industries affecting the public welfare and the development of the country's resources are objects within the scope of the police power. It also clarifies that an unconstitutional statute cannot repeal former laws or parts of laws by implication, as, being void, it is not inconsistent with such former laws. Furthermore, the case highlights that the delegation of authority or discretion regarding the execution of a law, under and pursuant to law, does not constitute an unlawful delegation of

legislative powers.

Class Notes:

- Police Power: The authority of the states to regulate behavior and enforce order within their territory for the betterment of the health, safety, morals, and general welfare of their inhabitants.
- Unconstitutional Statutes: A statute declared unconstitutional is considered void and cannot repeal or modify existing laws by implication.
- Delegation of Legislative Powers: The principle that while the delegation of power to make the law, which involves discretion as to what it shall be, cannot be done, conferring an authority or discretion as to its execution can be validly made.

Historical Background:

Act No. 3155 was enacted in the context of safeguarding the Philippine cattle industry from diseases potentially introduced through the importation of foreign cattle. This law, approved on March 8, 1924, came at a time when agricultural health was paramount to the country's economic and social development, reflecting the government's protective stance towards local industries during the early part of the 20th century.