

**\*\*Title:\*\* The People of the Philippines vs. Cayat**

**\*\*Facts:\*\*** In the case of The People of the Philippines vs. Cayat, the defendant, Cayat, a member of a non-Christian tribe from Baguio, Benguet, Mountain Province, was prosecuted for violating Act No. 1639, sections 2 and 3. This Act made it illegal for members of non-Christian tribes to buy, receive, have in their possession, or consume any alcoholic beverages other than native wines and liquors traditionally made by such tribes. The initial trial in the justice of the peace court of Baguio resulted in Cayat being fined five pesos (P5) or facing subsidiary imprisonment in case of insolvency. Unsatisfied, Cayat appealed to the Court of First Instance, where he faced a trial that reiterated the original charges, pleading not guilty based on the arguments presented in his demurrer. The Court found him guilty, fining him fifty pesos (P50) or subsidiary imprisonment for insolvency. The case escalated to the Supreme Court on the grounds of the Act's constitutionality, highlighting issues of discrimination, violation of due process, and the legitimacy of the exercise of the police power of the state.

**\*\*Issues:\*\*** The Supreme Court was tasked with examining the constitutionality of Act No. 1639 on the grounds of 1) whether it discriminated against non-Christian tribes, thereby denying them equal protection under the law; 2) whether it violated the due process clause of the Constitution; and 3) whether it constituted an improper exercise of police power.

**\*\*Court's Decision:\*\*** The Supreme Court upheld the constitutionality of Act No. 1639, addressing each concern as follows:

1. **\*\*Equal Protection of the Laws:\*\*** The Court ruled that the Act did not discriminate against non-Christian tribes, as the classification was based on substantial and real distinctions regarding the degree of civilization and was germane to the Act's purpose. The Court found the classification reasonable and applicable to all members of the class equally.
2. **\*\*Due Process Clause:\*\*** The Court opined that due process of law does not always necessitate notice and hearing, especially where administrative discretion is applied to particular cases. The contested provision allowing the seizure and destruction of prohibited liquors without a judicial hearing was deemed not to violate the due process clause.
3. **\*\*Exercise of Police Power:\*\*** The Court acknowledged the broad scope of the state's police power, emphasizing that Act No. 1639 was a legitimate exercise thereof. The Act aimed to promote peace and order among non-Christian tribes, facilitating their advancement and integration into the broader Filipino community.

**\*\*Doctrine:\*\*** The Supreme Court established that legislation based on reasonable classification does not violate the guarantee of equal protection of the laws, provided that such classification is based on substantial distinctions relevant to the law's purpose, applies equally to all members of the classified group, and adheres to reasonable applications of the state's police power for the welfare of the public.

**\*\*Class Notes:\*\***

- **\*\*Equal Protection:\*\*** Classification must rest on substantial distinctions, be germane to the purpose of the law, not be limited to existing conditions, and apply equally to all in the class.
- **\*\*Due Process:\*\*** Does not always require notice and hearing, depending on the necessity of administrative discretion in applying law to specific cases.
- **\*\*Police Power:\*\*** Represents the state's inherent authority to promulgate regulations to protect public health, morals, safety, and welfare.
- **\*\*Legal Statutes:\*\*** Act No. 1639, specifically Sections 2 and 3, related to the regulation of alcohol consumption among non-Christian tribes.

**\*\*Historical Background:\*\*** The context of this case traces back to the historical policy of the Philippine government towards non-Christian tribes, from the Spanish era to the American period, aimed at civilizing and integrating these populations into the fabric of national life while recognizing their equality. Act No. 1639 reflects a continuation of this policy, aimed at protecting and advancing non-Christian tribes towards eventual equality with their Christian counterparts.