

Title: The People of the Philippines vs. Maria Viuda de Sabarre, Pedro Guy, and Tomas Basista

Facts:

The case revolves around the conviction of Maria Vda. de Sabarre, Pedro Guy, and Tomas Basista by the Court of First Instance of Samar for violating a municipal ordinance in Catarman, Samar. The ordinance prohibited butchers and others from selling meat outside the public market. According to the court's judgment, each defendant was fined five pesos (P5), with subsidiary imprisonment in case of insolvency, and one-third of the costs.

The defendants appealed the judgment, raising two main issues: firstly, they argued that the municipal ordinance was unconstitutional and void for failing to clearly express the subject in its title and for being discriminatory, unreasonable, and oppressive. Secondly, they challenged their convictions, particularly questioning the validity and legality of the ordinance as applied to Defendants Guy and Basista.

Issues:

1. Whether the municipal ordinance in question is unconstitutional due to the prohibition not being indicated in its title.
2. Whether the municipal ordinance is discriminatory, unreasonable, and oppressive.
3. Whether the convictions of Defendants Guy and Basista were correct, assuming the validity of the ordinance.

Court's Decision:

1. ****Constitutionality of the Ordinance****: The Supreme Court dismissed the notion that municipal ordinances must have their subject indicated in their title, reasoning that ordinances are local in nature and not general laws. It referenced the Philippine Constitution and other jurisprudence, asserting that the requirement for a title to express the subject applies to general laws rather than local regulations. Thus, the ordinance was not found unconstitutional on these grounds.
2. ****Discriminatory, Unreasonable, and Oppressive Nature****: The Court found the ordinance neither discriminatory nor unreasonable. It made a distinction between selling meat and fish due to their different rates of decay and potential health risks. The Court also rejected the assertion that the ordinance was oppressive due to the unsanitary condition of the public market, noting it was the municipality's responsibility to maintain sanitary conditions.
3. ****Convictions of Pedro Guy and Tomas Basista****: The Court affirmed the conviction of

Guy and Basista, stating evidence showed they assisted Maria Vda. de Sabarre in slaughtering animals and selling the meat, thus violating the ordinance alongside her.

Doctrine:

This case reaffirmed the principles that:

- Municipal ordinances need not have their subject reflected in the title as required for general laws.
- Ordinances making distinctions based on substantial and genuine differences, and those that apply equally to all within a similar category, are not considered discriminatory.
- Municipalities are responsible for maintaining the sanitation of public markets.

Class Notes:

- ****Municipal Ordinances****: Local regulations not required to express the subject in the title.
- ****Discrimination in Law****: Authorized if based on substantial distinctions, related to the law's objective, applies to all in the classified group.
- ****Public Health and Sanitation****: Municipal responsibility; sanitation requirements can justify regulations like market activity restrictions.
- ****Subsidiary Imprisonment****: Applicable in case of inability to pay fines as per Philippine legal system.

Historical Background:

At the time of this ordinance and subsequent legal challenge (1936), the Philippines was under the Commonwealth period, a transitional phase towards full independence. During this period, local governance structures like municipalities were empowered to enact ordinances for public health and safety, which sometimes led to legal challenges on the grounds of constitutionality or reasonableness, as seen in this case.