

Title: People of the Philippine Islands vs. Augusto A. Santos

Facts:

The case initiated on June 18, 1930, when the provincial fiscal of Cavite filed an information against Augusto A. Santos for allegedly violating Section 28 of Fish and Game Administrative Order No. 2 by the Secretary of Agriculture and Commerce. The accusation was based on Santos operating two fishing motor boats, Malabon II and Malabon III, within three kilometers of the shore line of Corregidor Island without permission from the Secretary of Agriculture and Commerce. This area was under the jurisdiction of naval and military authorities of the United States. The case was dismissed by the Court of First Instance of Cavite on jurisdictional grounds, stating it falls within the original jurisdiction of the justice of the peace court. The dismissal led to an appeal by the prosecuting attorney, contending that the dismissal was erroneous since the court possessed original jurisdiction over the case.

Procedural Posture:

The prosecution's appeal to the Supreme Court questioned the lower court's dismissal of the case due to a perceived lack of original jurisdiction. The Supreme Court's task was to review whether the Court of First Instance of Cavite erred in its judgment.

Issues:

- Whether the conditional clause of Section 28 of Administrative Order No. 2 is valid.
- Whether the Court of First Instance of Cavite correctly dismissed the case based on jurisdictional concerns.

Court's Decision:

The Supreme Court held that the conditional clause of Section 28 of Administrative Order No. 2 is null and void. It reasoned that this clause constituted an overreach of the regulatory powers given to the Secretary of Agriculture and Commerce by Section 4 of Act No. 4003 and an unauthorized exercise of legislative power which can only be vested in the Philippine Legislature or the National Assembly. Consequently, since the alleged actions of Augusto A. Santos did not violate any criminal law enforceable by civil courts, the information against him was dismissed, with costs de officio.

Doctrine:

This case reiterated the doctrine that regulatory authorities cannot extend or create laws through administrative orders as this constitutes an exercise of legislative power, which is

reserved exclusively for the legislative body. Regulatory powers must be consistent with existing laws, and any attempt to extend these beyond the law is null and void.

Class Notes:

1. **Jurisdiction**: The original jurisdiction concerning the enforcement of certain regulatory measures falls with the lowest court of territorial jurisdiction unless specified otherwise within the law.
2. **Administrative Orders and Legislative Powers**: Administrative orders are tools for implementing existing laws, not for creating new legal obligations or restrictions. Legal statutes must expressly grant the power or guidelines for such orders, and any extension beyond these statutes is deemed unauthorized and void.
3. **Doctrine of Separation of Powers**: The legislative body alone has the authority to enact, amend, or repeal laws. Regulatory bodies or executive officers cannot exercise this power through administrative means.

Historical Background:

The case represents an early contestation of the limits of regulatory authority under Philippine law, emphasizing the separation of powers between the legislative and executive branches. This decision underscored the principles of legal jurisdiction and the boundaries of administrative rule-making within the context of Philippine governance during the American colonial period.